

PRIVACY POLICY

1. INTRODUCTION

- 1.1. This Privacy Policy describes how GMhost LLC and its affiliates («GMhost», «we», «our» or «us») collect, use, and share information in connection with your use of our websites (including www.gmhost.hosting, www.gmhost.com.ua, hereinafter referred to as the «Website»), services, and applications (collectively, the "Services"). This Privacy Policy ("Privacy Policy», «This Policy») does not apply to information our customers may process when using our Services.
- 1.2. We respects the right to privacy and undertakes to protect it for all it's customers, including the visitors of the Website, and the dig into protect the privacy of their personal data and assurance of their rights as data subjects.
- 1.3. We may collect and receive information about users of our Services ("users," "you," or "your") from various sources, including:
 - 1.3.1. information you provide through your user account on the Services (your "Account") if you register for the Services;
 - 1.3.2. your use of the Services; and
 - 1.3.3. from third-party websites, services, and partners.
- 1.4. This Policy applies only to information that you provide to us or that we collect through the Services. This Policy does not apply to websites, applications or services that display or link to different privacy statements.
- 1.5. This Policy governs the basic principles and procedures for collecting, processing and storing personal data of the our customers (including the Website visitors).
- 1.6. By using the Website, as well as by subscribing/using the Services offered by GMhost and providing your personal data to us, you agree to this Policy (except for the data processing actions that will require your individual consent). Customers are deemed to be familiar with the Privacy Policy when they tick the check box during the registration of Account on the Website. You can reach Privacy Policy at any time on the Website.
- 1.7. Your personal data is processed in accordance with the General Data Protection Regulation (EU) 2016/679 (hereafter General Data Protection Regulation), Law on the Protection of Personal Data, as well as other legal documents.

2. WHAT DEFINITIONS ARE USED?

- 2.1. Personal Data means any information about a natural person who is identified or identifiable (the data subject); a natural person who can be identified, whose identity can be determined directly or indirectly, in particular, by the identifier, such as his name, personal identification number, location data and internet identifier, or according to one or more features of physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person.
- 2.2. The Data Subject is a natural person, a customer of GMhost (including the Website visitors) whose personal data are collected by us.
- 2.3. Consent of Data Subject means any express, specific and unequivocal expression of the will of the duly notified data subject in a statement or unambiguous manner in which he consents to processing of the personal data relating to him.

- 2.4. Data Processing – any operation or sequence of operations, such as collecting, recording, sorting, organizing, storing, adapting or modifying, extracting, accessing, using, disclosing, transmitting, distributing, or otherwise changing, by automated or non-automated means of personal data or personal data sets and access to them, as well as matching or interconnection with other data, their restriction, erasure or destruction.
- 2.5. Data Processor means a natural or legal person, a public authority, an agency or other entity that processes Personal Data on behalf of the data controller.
- 2.6. Data controller is GMhost LLC, a company set up in accordance with the laws of the Ukraine, code 41383906, registered office address 29007, Ukraine, Khmelnytskyi, Zavodska street, 46.
- 2.7. A Cookie is a small piece of text information automatically created when browsing the Website and is stored on your computer or other end device.
- 2.8. Direct Marketing shall mean an activity intended for offering goods or services to individuals by post, telephone or any other direct means and/or for obtaining their opinion about the offered goods or services.

3. WHAT OF YOUR PERSONAL DATA WE COLLECT?

INFORMATION YOU PROVIDE

- 3.1. We collect and further process the following Personal Data that you submit to us yourself by signing up and/or ordering the Services on the Website or by ordering Services in other ways:
 - 3.1.1. e-mail address;
 - 3.1.2. passwords;
 - 3.1.3. data relating to the provision of Services, such as the service and details of its order, account numbers, billing, payment details, consent and disagreements regarding the processing of personal data for direct marketing purposes;
 - 3.1.4. any other data you provide additionally, at your own initiative, by signing up and/or ordering and managing the services (telephone number, name, surname, address, registration documents etc.).

PAYMENT INFORMATION

- 3.2. When you add your financial account information to your Account, that information is directed to our third-party payment processor. We do not store your financial account information on our systems; however, we have access to, and may retain, subscriber information through our third-party payment processor.

COMMUNICATIONS

- 3.3. If you contact us directly, we may receive additional information about you such as your name, email address, phone number, the contents of the message and/or attachments you may send us, and any other information you may choose to provide. We may also receive a confirmation when you open an email from us.

INFORMATION WE COLLECT WHEN YOU USE OUR SERVICES

- 3.4. Cookies and Other Tracking Technologies. As is true of most websites, we gather certain information automatically and store it in log files. In addition, when you use our Services, we may collect certain information automatically from your device. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, clickstream data, landing page, and referring URL. To collect this information, a cookie may be set on your computer or device when you visit our Services. Cookies contain a small amount of information that allows

our web servers to recognize you. We store information that we collect through cookies, log files, and/or clear gifs to record your preferences. We may also automatically collect information about your use of features of our Services, about the functionality of our Services, frequency of visits, and other information related to your interactions with the Services. We may track your use across different websites and services. In some countries, including countries in the European Economic Area ("EEA"), the information referenced above in this paragraph may be considered personal information under applicable data protection laws. We use cookies on the Website in order to make it possible for you to more conveniently and efficiently browse the Website and provide you with useful offers. These cookies are used when you connected to Website.

- 3.5. Usage of our Services. When you use our Services, we may collect information about your engagement with and utilization of our Services, such as processor and memory usage, storage capacity, navigation of our Services, and system-level metrics. We use this data to operate the Services, maintain and improve the performance and utilization of the Services, develop new features, protect the security and safety of our Services and our customers, and provide customer support. We also use this data to develop aggregate analysis and business intelligence that enable us to operate, protect, make informed decisions, and report on the performance of our business.

INFORMATION WE RECEIVE FROM THIRD PARTIES

- 3.6. Third-Party Accounts. If you choose to link our Services to a third-party account, we will receive information about that account, such as your authentication token from the third-party account, to authorize linking. If you wish to limit the information available to us, you should visit the privacy settings of your third-party accounts to learn about your options.
- 3.7. Third-Party Partners. We may also receive publicly available information about you from our third-party partners and combine it with data that we have about you.

4. HOW LONG WE STORE YOUR DATA?

- 4.1. Your Personal Data referred to in clause 3.1 are stored during the period of cooperation of GMhost and you (during the provision of services) and for 10 (ten) years from the end of this period.
- 4.2. Your personal data referred to in clause 3.4 are stored during the period of cooperation of GMhost and you (during the provision of Services) and depending on the data, up to 2 (two) years after the end of this period. These data may be stored for a longer period if there are other legal grounds for such storage period.

5. LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION

- 5.1. Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.
- 5.2. However, we will normally collect personal information from you only:
 - 5.2.1. where we need the personal information to perform a contract with you;
 - 5.2.2. where the processing is in our legitimate interests and not overridden by your rights; or
 - 5.2.3. where we have your consent to do so.
- 5.3. We have a legitimate interest in operating our Services and communicating with you as necessary to provide these Services, for example when responding to your queries, improving our platform, undertaking marketing, or for the purposes of detecting or preventing illegal activities.

- 5.4. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.
- 5.5. If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

6. FOR WHAT PURPOSES WE PROCESS YOUR PERSONAL DATA?

- 6.1. We processes the above personal data for the following purposes of data processing:
 - 6.1.1. provide, operate, and maintain our Services;
 - 6.1.2. improve, personalize, and expand our Services;
 - 6.1.3. understand and analyze how you use our Services;
 - 6.1.4. develop new products, services, features, and functionality;
 - 6.1.5. communicate with you, either directly or through one of our partners, including for customer service, to provide you with updates and other information relating to the Service, and for marketing and promotional purposes;
 - 6.1.6. process your transactions;
 - 6.1.7. send you text messages and push notifications;
 - 6.1.8. find and prevent fraud; and
 - 6.1.9. for compliance purposes, including enforcing our Terms of Service, or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency.

7. HOW DO WE PROCESS YOUR PERSONAL DATA?

- 7.1. We ensure that your Personal Data will be:
 - 7.1.1. processed in a lawful, fair and transparent manner;
 - 7.1.2. data are collected for specified, clearly defined and for legitimate purposes, and not further processed in a way incompatible with those purposes;
 - 7.1.3. adequate, appropriate data and necessary only for the purposes for which they are processed (applying the data reduction principle);
 - 7.1.4. accurate and, if necessary, updated (applying the precision principle);
 - 7.1.5. managed in such a way as to ensure the adequate protection of personal data, including the protection against unauthorized processing or processing of unauthorized data and unintentional loss, destruction or damage by appropriate technical or organizational measures (applying the principles of integrity and confidentiality).
- 7.2. We not sell, rent, or lease any individual's personal information or lists of email addresses to anyone for marketing purposes, and we take commercially reasonable steps to maintain the security of this information. However, GMhost reserve the right to supply any such information to any organization into which GMhost may merge in the future or to which it may make any transfer in order to enable a third party to continue part or all of its mission.

8. SECURITY. HOW DO WE PROTECT YOUR PERSONAL DATA?

- 8.1. We committed to protecting your information. To do so, we employ a variety of security technologies and measures designed to protect information from unauthorized access, use, or disclosure. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. No server, however, is 100% secure, and you should take this into account when submitting personal or confidential information about yourself on any web site, including this one. Much of the personal information is used in conjunction with member services such as collaboration and discussion, so some types of personal information such as your name, company affiliation, and email address will be visible to the public. We assume no liability for the interception, alteration, or misuse of the information you provide. You alone are responsible for maintaining the secrecy of your personal information. Please use care when use access this web site and provide personal information.

9. WHAT DATA SUBJECT RIGHTS YOU HAVE UNDER THE GENERAL DATA PROTECTION REGULATION (GDPR)?

- 9.1. You have the following rights of the data subjects:

THE RIGHT OF ACCESS TO DATA

- 9.2. to obtain information as to whether or not we processes your Personal Data, and, where that is the case, access to the Personal Data processed by us;
- 9.3. to receive information on what Personal Data and from which sources are collected, the purposes of the processing, the recipients to whom the Personal Data have been or may be provided;
- 9.4. to obtain from us a copy of the Personal Data undergoing processing in accordance with the applicable law;
- 9.5. to be informed of how your Personal Data are processed;
- 9.6. to ask us to transfer your Personal Data to another Data Controller;

THE RIGHT OF RECTIFICATION

- 9.7. request to correct any inaccurate personal data relating to you, and request to supplement the incomplete personal data;

THE RIGHT TO BE FORGOTTEN

- 9.8. to request the termination of the data processing (erase the data), in the case the data subject withdraws consent on which the processing is based, or the personal data are no longer necessary in relation to the purposes for which they were collected, or the personal data have been unlawfully processed, or the personal data have to be erased for compliance with a legal obligation;
- 9.9. it should be noted that the right to require the immediate erasure of your Personal Data may be limited or not possible due to the obligation of GMhost to store data about the clients' identification, payment transactions, concluded agreements, etc. for the period laid down in legislation;

THE RIGHT TO RESTRICTION OF PROCESSING

- 9.10. to request to restrict the processing of personal data, for a period enabling the controller to verify the accuracy of the personal data;

- 9.11. the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- 9.12. the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims
- 9.13. a data subject who has obtained restriction of processing shall be informed by the data controller before the restriction of processing is lifted;

THE RIGHT TO OBJECT

- 9.14. to disagree to the processing of your Personal Data (for example, for direct marketing or otherwise);
- 9.15. to address the supervisory authority with a claim regarding the processing of your Personal Data, if you believe that the Personal Data are processed in violation of your rights and legitimate interests stipulated by applicable legislation;
- 9.16. to contact the Data Controller and/or the data protection officer for the purpose of exercising your rights;
- 9.17. other statutory rights.

10. ACCESS. HOW CAN YOU MANAGE OR DELETE INFORMATION?

- 10.1. We are committed to keeping the personal information of our users accurate. All the information you have submitted to us can be verified, changed and corrected by your request. We provide you with online access to your own personal profiles, enabling you to manage your personal information.
- 10.2. If you are a registered user, you may access certain information associated with your Account by logging into our Services or emailing support@gmhost.hosting. In the client area you can view the documents about Personal Data collection and processing, and the consent log. You can submit a support ticket to request the information about Personal Data being used. Also, you can mail at 29007, Ukraine, Khmelnytskyi, Zavodska street, 46
- 10.3. In the notifications settings form you can subscribe or unsubscribe from SMS or email notifications. Also, you can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing emails we send you. To opt-out of other forms of marketing, please contact us by emailing support@gmhost.hosting.
- 10.4. To protect your privacy and security, we may also take reasonable steps to verify your identity before updating or removing your information. The information you provide us may be archived or stored periodically by us according to backup processes conducted in the ordinary course of business for disaster recovery purposes. Your ability to access and correct your information may be temporarily limited where access and correction could:
 - 10.4.1. inhibit GMhost ability to comply with a legal obligation;
 - 10.4.2. inhibit GMhost ability to investigate, make or defend legal claims; result in disclosure of personal information about a third party;
 - 10.4.3. or result in breach of a contract or disclosure of trade secrets or other proprietary business information belonging to GMhost or a third party.
- 10.5. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

11. PERSONAL DATA PROCESSING FOR DIRECT MARKETING PURPOSE

- 11.1. Only with your prior consent and following the LPPD, LEC and the provisions of the Regulation, we will send you newsletters by e-mail and/or ask about the quality of existing services.
- 11.2. We process the following of your personal data for direct marketing purposes: full name; e-mail address; phone number.

12. TO WHOM DO WE PROVIDE YOUR PERSONAL DATA?

- 12.1. The GMhost employees are given access to your Personal Data only if it is necessary to fulfil their responsibilities and only with the employee's obligation to comply with the confidentiality requirement.

- 12.2. We can provide your personal data to:

VENDORS AND SERVICE PROVIDERS

- 12.2.1. We may share information with third-party vendors and service providers that provide services on our behalf, such as helping to provide our Services, for promotional and/or marketing purposes, and to provide you with information relevant to you such as product announcements, software updates, special offers, or other information.

AGGREGATE INFORMATION

- 12.2.2. Where legally permissible, we may use and share information about users with our partners in aggregated or de-identified form that can't reasonably be used to identify you.

ADVERTISING

- 12.2.3. We work with third-party advertising partners to show you ads that we think may interest you. These advertising partners may set and access their own cookies, pixel tags, and similar technologies on our Services, and they may otherwise collect or have access to information about you which they may collect over time and across different online services.

THIRD-PARTY PARTNERS

- 12.2.4. We also share information about users with third-party partners in order to receive additional publicly available information about you.

INFORMATION WE SHARE WHEN YOU SIGN UP THROUGH A REFERRAL

- 12.2.5. If you sign up for our Services through a referral from a friend, we may share information with your referrer to let them know that you used their referral to sign up for our Services.

ANALYTICS

- 12.2.6. We use analytics providers such as Google Analytics. Google Analytics uses cookies to collect non-identifying information. Google provides some additional privacy options regarding its Analytics cookies at <http://www.google.com/policies/privacy/partners/>.

BUSINESS TRANSFERS

- 12.2.7. Information may be disclosed and otherwise transferred to any potential acquirer, successor, or assignee as part of any proposed merger, acquisition, debt financing, sale of assets, or similar transaction, or in the

event of insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets.

AS REQUIRED BY LAW AND SIMILAR DISCLOSURES

12.2.8. We may also share information to:

- 12.2.8.1. satisfy any applicable law, regulation, legal process, or governmental request;
- 12.2.8.2. enforce this Privacy Policy and our Terms of Service, including investigation of potential violations hereof;
- 12.2.8.3. detect, prevent, or otherwise address fraud, security, or technical issues;
- 12.2.8.4. respond to your requests; or
- 12.2.8.5. protect our rights, property or safety, our users and the public.

This includes exchanging information with other companies and organizations for fraud protection and spam/malware prevention.

WITH YOUR CONSENT

12.2.9. We may share information with your consent.

13. THIRD-PARTY SERVICES

13.1. You may access other third-party services through the Services, for example by clicking on links to those third-party services from within the Services. We are not responsible for the privacy policies and/or practices of these third-party services, and we encourage you to carefully review their privacy policies.

14. CHILDREN'S PRIVACY

14.1. GMhost LLC does not knowingly collect information from children under the age of 16, and children under 16 are prohibited from using our Services. If you learn that a child has provided us with personal information in violation of this Privacy Policy, you can alert us at support@gmhost.hosting.

15. WHAT LINKS WE PROVIDE ON THE WEBSITE?

15.1. The Website will contain the links to third-party websites, legal acts, as well as social networks (has ability to share content on Facebook and LinkedIn social networks, Instagram as well as on YouTube). It should be noted that third-party sites whose links are posted on the Website are subject to the privacy policies of these websites and we is not responsible for the content of the information provided by these websites, their activities and their privacy policies.

16. CHANGES TO THIS PRIVACY POLICY

16.1. This Privacy Policy may be modified from time to time, so please review it frequently. Changes to this Privacy Policy will be posted on our websites. If we materially change the ways in which we use or share personal information previously collected from you through our Services, we will notify you through our Services, by email, or other communication.



17. CONTACT

You may contact us at the following address:

GMHOST LLC
29007 Ukraine, Khmelnytskiy,
Zavodska street, 46

Registration number (EDRPOU code) 41383906
Account number 26000052323950 in Khmelnytskiy Branch of
Public Joint Stock Company Commercial Bank "PrivatBank"
The contractor is not a value added tax payer.