

## PRIVACY POLICY

We, LIMITED LIABILITY COMPANY OBJECT CONTROL (hereinafter the Company), are committed to process personal data of individuals lawfully, fairly and in a transparent manner. This Privacy Policy (hereinafter – the Privacy Policy) outlines the Company’s approach to processing personal data of individuals.

### Definitions

**Object Control** (also **Company, We, Our**) shall mean LIMITED LIABILITY COMPANY OBJECT CONTROL, a legal entity established under the legislation of Ukraine, identification code 40164674, address: Ukraine, 01001, Kyiv, Esplanadna St., 20, office 1107.

**Website** means the Company’s website available at <https://objectcontrol.com.ua>, including all pages and subdomains.

**Application** means mobile application available on Google Play Market and Apple App Store as Object Control.

**User** (also **You, Your**) means any individual using the Website and/or the Application to obtain the Services for own purposes, or for the benefit of another individual or legal entity on their behalf (third parties).

**Personal data** means any information that relates to the User and can be directly or indirectly identified, in particular by referring to an ID.

**Processing** means any actions, when We or another entity on our behalf collect, store, record, structure, adapt, use, make available, erase and restrict access to Your personal data.

**Services** mean the services provided by the Company, available on the website and in the Application, which include but are not limited to the creation of electronic property inspection reports or other documents, their signing and exchange.

### I. Who is responsible for Your personal data?

(1) If We process Your personal data independently or jointly with other entities, We are the collector and processor of such personal data.

(2) In some cases, as stated below (clause (5) and (6), section II), We act only as the processor of personal data provided by third parties. We only process such personal data according to the instructions and on behalf of third parties.

### II. What information do We collect and for what purpose?

(1) We can process personal data provided by the User, such as:

- email address;
- full name;
- data from ID card (passport) (name, surname, patronymic, ID number, date of birth);
- phone number;
- information on work (place of work, position, etc.);
- geographic location and address;
- identification information about movable property (cars, special vehicles, etc.) and immovable property (apartment, house, etc.), photos and/or description and/or video of the object;
- electronic identification information (eID), for example bank-ID, electronic signature;
- information contained on the photocopies of personal documents of the User and/or photo of the User;
- other information provided to Us.

(2) Categories of personal data specified in Clause (1) are used for User registration, access to the Company’s services and customer support, as well as for internal statistics.

(3) The legal basis for processing of personal data specified in Clause (1) is:

- fulfillment of the service agreement concluded with the User, or taking measures at the User’s request before conclusion of the service agreement, or
- Our legitimate interests, in particular to provide access to the service of our Contractor’s employees.

The User is not obliged to provide any personal information, but this may affect the agreement fulfillment and access to services.

(4) Additionally we process personal data stated in Clause (1):

- for development and improvement of services;
- for internal analysis of the User information;
- in corporate restructurings;
- in discretionary interaction, personalized communication with the User;
- for information, system, network and cybersecurity.

In these cases, processing is required to satisfy Our legitimate interests in improving the service and protecting data from security breach.

(5) Some personal data are provided by the User acting on behalf of a data subject (for example, the controller's customer) as a controller. Such data may include:

- name and surname of the data subject;
- data from ID card (passport) (name, surname, ID number and date of birth) of the data subject, photo of ID card (passport);
- identification information on the property (car, apartment, house, etc.), photos and/or video of the property;
- other information provided to Us.

(6) We process personal data stated in Clause (5) only subject to instructions and scope of services to third parties and on their behalf. The controller is responsible for complying with any regulations or laws that require consent and/or notification before submitting the data to Us.

### **III. How long do we keep Your personal data?**

(1) We keep Your personal data while Your personal account is active and 4 years thereafter.

(2) Personal data in electronic documents made by the User is kept for 4 years after their creation.

### **IV. How Your personal data is processed?**

(1) We, as a controller and processor of Your provided personal data, take appropriate technical, organizational and legal measures so that processing will protect Your rights.

(2) Personal data is collected directly from the User (filling online forms) and by monitoring (automated data capture equipment, data capture software).

(3) Personal data is processed by electronic automated tools, strictly related to the purpose specified in the Privacy Policy.

### **V. Who can we give access to Your personal data?**

(1) We usually do not share your personal data with third parties, except when We cooperate with other intermediary service providers to deliver Our services and/or when personal data is shared with the person providing services to You to ensure the delivery of such services.

(2) We use data servers of AWS Amazon.com, Inc. to process Your personal data. The relevant provisions on personal data processing by Amazon.com, Inc can be found at Amazon.com.

### **VI. What are Your rights?**

If You are in the European Union, you have the following rights:

(1) **The right to access** Your personal data and the right to know what personal data we process and on what terms.

(2) **The right to complete, correct or delete** Your personal data, if you believe that it is incomplete or inaccurate.

(3) The right to receive a copy of Your personal data in a structured, commonly used and machine-readable format (**the right to data portability**).

(4) **The right to object to the processing** of Your personal data according to Clause (6) of Section II;

(5) **The right to demand limitation or prohibition** of Your personal data processing, if:

- We check the accuracy of personal data at the User's request;
- The personal data has been processed unlawfully;

- We no longer need the personal data, but the User needs it to establish, exercise or protect own rights;
- You objected to the processing of Your personal data to protect legitimate interests (clause (5) and (6), Section II), and We decide whether our legitimate interests prevail over Your fundamental rights.

(6) **The right to file a complaint** to the regulatory authority at the place of Your residence.

If You are in Ukraine, you have the following rights:

- (1) **The right to know** the sources of collection and location of personal data, the purpose of its processing, the location or place of residence (stay) of the personal data controller or processor, or give the appropriate instructions for their authorized persons to obtain such information;
- (2) **The right to obtain information** on conditions for granting access to the personal data, in particular information on third parties receiving Your personal data;
- (3) **The right to access** to own personal data;
- (4) **The right to be informed whether personal data is processed** and to receive the contents of such personal data;
- (5) **The right to submit a reasoned request** to the personal data collector against processing of the personal data;
- (6) **The right to submit a reasoned request** to change or delete personal data by any collector and processor of the personal data, if this data is processed unlawfully or is incorrect;
- (7) **The right to protect own personal data** against illegal processing and accidental loss, destruction and damage due to deliberate concealment, failure to provide or untimely provision, and to protection against provision of false information or information, which harms a person's honour, dignity or business reputation;
- (8) **The right to submit complaints** regarding the personal data processing to the Ukrainian Parliament Commissioner for Human Rights or to the court;
- (9) **The right to use means of legal defense** in cases of violations of the law on the personal data protection.

#### **VII. Children's privacy**

- (1) Please pay attention that Our services are not intended for use by children under the age of **16**, and if you live in Ukraine – under the age of **14**. We deliberately do not collect personal data of children.
- (2) If You become aware that a child has provided own personal data, please contact Us.
- (3) If We become aware that We have collected children's personal data without parental consent, We will take measures to delete this data from Our servers or servers of Our service providers.

#### **VIII. Cookies**

- (1) We use cookies on our website to correctly and accurately render its content. Please see Our Cookie Policy for more details.

#### **IX. Do you have any questions about privacy?**

- (1) You have the right to contact us with any question regarding personal data by e-mail: [info@objectcontrol.com.ua](mailto:info@objectcontrol.com.ua).
- (2) We will respond to any e-mail without delay and always within a month.

#### **X. Collector and processor of personal data**

- (1) The collector and processor of personal data is Object Control LLC, a legal entity established under the legislation of Ukraine, identification code 40164674, address: Ukraine, 01001, Kyiv, Esplanadna St., 20, office 1107.

#### **XI. Amendments to the Privacy Policy**

- (1) This Privacy Policy may be amended and revised and We reserve the right to amend and update it. We recommend that you regularly read the Privacy Policy.

(2) In case of significant amendments to the Privacy Policy (for example, amended ability to exercise rights, grounds for processing, change of the collector), we shall inform You of such amendments by electronic means.

(3) This Privacy Policy came into force on February 25, 2021.