

## ***Privacy Information Policy***

Before using our services, please carefully review this Privacy Policy, which governs the relationship between you (hereinafter referred to as the "Client") and Esmart Finance (hereinafter referred to as the "Organization").

This document sets forth the principles of processing and protecting the Client's personal data by the Organization. Personal data refers to any information that allows for the identification of you as an individual. We also provide detailed information on how your personal information is used, collected during the provision of services, and through communication with us by phone, email, or other means. This document explains the data we collect, to whom we may disclose it, the purposes for doing so, how we ensure its security, and the rights we grant you to safeguard the confidentiality of your data.

Esmart Finance takes its obligations to protect clients' personal information and ensure the security of personal data seriously. We take all necessary legal and technical measures to prevent loss, unauthorized use, alteration, or unauthorized access to data by third parties.

By accepting the terms of this Privacy Policy, the Client gives consent to the collection, storage, processing, and disclosure of personal data in accordance with the terms of this Policy and applicable legislation. If you need to withdraw your consent or request the deletion of your personal data, please contact us.

### ***What types of personal data does the company collect?***

The company collects various types of personal data. You can provide us with unique details, contact information, financial information, and other information by filling out online forms or submitting requests to us by phone, email, confirming data in your personal account, or other means. We also collect personal information that you provide in the following situations:

- 1) When using our products or services;
- 2) When registering an account on our website;
- 3) When subscribing to our newsletters or newsletters from third-party partners collaborating with us;
- 4) When consenting to receive our promotional materials and newsletters;
- 5) When participating in surveys, loyalty programs, special promotions, or training;
- 6) When filling out questionnaires.

On some pages of our website, you have the option to provide your personal information voluntarily (for example, providing contact details for registration in a personal account, participating in advertising events, or subscribing to newsletters from us and/or our partners).

When you visit our website from your device, certain data is automatically transmitted to us. In some jurisdictions, including the European Union, such data may be considered personal data in accordance with data protection legislation. Some of this information is collected using cookies. Details about the cookies we use and their purposes can be found in our Cookie Policy.

### ***How can the company use your personal information?***

- Sending informational materials;
- Ensuring the effective operation of our services;
- Analyzing and studying our audience to improve the services we offer;
- Investigating possible violations of this Privacy Policy, ensuring compliance with requirements, as well as protecting our interests and rights.

We may also send you promotional messages with information about our services that we believe may be of interest to you.

In accordance with the provisions of this document, we will use the customer's personal data provided by them for the purpose of receiving our support and services.

Confidentiality and data protection are our highest priorities, so we undertake to use the information obtained only in accordance with the law and confidentiality standards.

The grounds for collecting and using the customer's personal data may include distinguishing data (name, surname, country of residence, address, and other comparative data), contact information (email address, phone number, website page, courier number, etc.), archives of publicly available identifiers (identification, residency permits, etc.), budgetary data (accounting book number, credit card number, cardholder's name, reports demonstrating the origin of cash, etc.), political significance (reports and denials), descriptive data (duplicates of records confirming the given data).

### ***Specifically, we will use the obtained personal data for the following purposes:***

- 1) Providing customer support. This may involve using customer contact information and identifier archives to ensure prompt and effective resolution of any potential issues.
- 2) Risk administration, tax evasion, and response to administrative and legal requirements. We may use customer's valuable, monetary, and personal information for the purpose of analyzing and minimizing risks associated with our operations, as well as for compliance with tax legislation.
- 3) Marketing purposes. We may use customer's contact information to send promotional messages and updates about our products and services. However, we commit to using this data only if the customer has provided consent to receive such communications, and in accordance with the applicable laws and confidentiality standards.

### ***Privacy Policy: Information Disclosure***

In accordance with applicable legislation and privacy rules, the organization has certain limitations regarding the disclosure of data to third parties. The organization does not disclose personal data, such as names, addresses, email addresses, and other confidential information, to organizations, associations, or individuals outside the organization, except as required by law.

*Such exceptional cases include, but are not limited to, the following:*

- Compliance with laws, principles, and governmental requirements that are mandatory for the organization.
- Application of applicable regulations, including the detection of possible violations.
- Prevention of misinformation, ensuring security, or resolving specialized issues.
- Protection of the rights, property, or safety of the organization, its clients, or other individuals.

The organization may disclose certain identifiable data to its partners who are involved in providing services, data analysis, or supporting our users. The organization may also share publicly available information about how our users use the website to track and improve our services.

In the event that the organization engages in consolidation, sale, or provision of assets that may affect the transfer of information, the organization will continue to uphold its confidentiality obligations with respect to any user information and advice until such information is transferred or becomes subject to another protection strategy.

### ***Client Rights***

As a client of our company, you have several important rights regarding the processing of your personal information. We guarantee that we will comply with all applicable laws and regulations regarding the protection of your information. As a client, you have the following rights:

- 1) Right to receive a copy of your personal information that we possess.
- 2) Right to correct inaccurate data and/or supplement missing information. We commit to informing all third parties who may have access to your data, as described above.
- 3) Right to transfer all your personal information to another controller of your choice.
- 4) Right to opt-out of receiving promotional emails using the "unsubscribe" or "opt-out" buttons.
- 5) Right to request the cessation of processing your personal information. However, please note that this may affect the use of some of our services.
- 6) Right to withdraw your consent to the processing of your information. Please note that this may affect the use of some of our services.
- 7) Right to request the complete deletion of your information upon your request.
- 8) Right to lodge a complaint with the supervisory authority regarding the processing of your personal information.

### ***Automatic Decisions: What You Should Know***

We assure you that we will protect your rights in accordance with applicable laws and regulations, and we are always ready to assist you with any inquiries related to your information.

We would like to draw your attention to an important aspect of our privacy policy related to automatic decisions.

Automatic decision-making is a process that relies on the processing of your personal information using algorithms, software, and other tools. These decisions may be made without human involvement and can have a significant impact on you.

We make every effort to minimize the use of automatic decisions concerning your personal data. However, in some cases, such decisions may be necessary to provide you with our services or fulfill our legal obligations.

If you disagree with an automatically made decision or have questions regarding this matter, you have the right to appeal the decision, express your position, and request a review of the decision by a specialist.