

Privacy Policy

Last updated: 1 of July 2025

Tviy LTD, a company duly incorporated in the United Kingdom, company No. 13997583, with its registered seat in 61 Bridge Street, Kington, Herefordshire, HR5 3DJ, United Kingdom (hereafter referred to as “Tviy”, “we”, “us” and “our”), complies with all relevant data protection laws and strives to maintain robust data protection for the Users of our Tviy website - <https://www.tviyit.com/> (hereinafter – the “Website”).

This document (the "Policy", the "Privacy Policy") presents information regarding the nature, purpose, processing methods (collection, use, storage, distribution, deletion, etc.) and features of protecting personal data / personal information collected through the Website ("Personal Data" or "Data"). In addition, in this document, you can find information about your rights and how to contact us if you have any questions about processing information about you.

1. General provisions on Data protection

This Policy applies to those individuals whose Personal Data is processed or may be processed by us in future as a data controller, including, but not limited to, if such persons access the Website, contact us with inquiries, follow a hyperlink (link) to this Policy, use our Services, accompanied by the collection of Personal Data.

Tviy makes its Services available practically worldwide, excluding the EU list of non-cooperative jurisdictions and the jurisdictions specified in the UN, the OECD blacklists etc.

We do our best to protect all Personal Data received from our Users and comply with all local data protection laws to the extent they apply to us.

As a rule, we do not collect Personal Data when you just visit the Website without registration, except for the lawful operation of cookies and similar technologies, and when you consent to process Personal Data in some instances. However, the provision of Personal Data through the Website is voluntary; we do not require you to register or provide Personal Data if you don't use some Services or the functionality of the Website which requires such. However, failure to provide specific Personal Data may lead to the fact that the Website cannot provide you with the desired Services you would like to use through the Website.

To process your Personal Data we need to receive your consent, as it is prescribed by applicable law, we will process your Personal Data only in the case we have received from you a freely given, specific, informed, and unambiguous indication of your wishes by which you signify agreement to the processing of your Personal Data (the “Consent”).

You may give your Consent by ticking the respective box when you use the Website. In the case you tick the respective box, you irrevocably and unconditionally consent and agree that we shall be entitled to process your Personal Data as it is indicated by your Consent.

Your Consent covers all processing activities with your Personal Data carried out for the same purpose or purposes. When the processing has multiple purposes, your Consent should be deemed given for all of them.

The use of the Website is governed by this Policy and relevant legislation concerning the processing and protection of Personal Data. If you do not want us to collect and process Personal Data about you under this Policy, you will not be able to use part of the functionality of the Website and the related Services.

We inform you that Tviy is a Data Controller for the purposes of the General Data Protection Regulation (EU GDPR) and any other applicable data protection law when we control Personal Data collection methods and determine the purposes for which such Personal Data will be used.

For non-EU residents, the basis of information processing is set out by the relevant legislation of their residence and GDPR.

At the same time, we will use specific Personal Data for or in the process of providing certain Services only at the direction of our Users, for example, when the User finds information or independently enters the information containing Personal Data. The User independently determines the purposes of processing and the further fate of these Personal Data. In this case, Tviy is the Data Processor.

This Policy does not apply when Tviy acts as a Data Processor or in any other similar role when acting on behalf of a third party. In this case, we process Personal Data on the instructions and on behalf of a third party or the User. Accordingly, a third party's privacy policy/statement shall apply.

We will process your Personal Data only if at least one of the following legal grounds for such processing exists, including:

- processing is necessary for the conclusion and/or the performance of a contract with you (including any offer and acceptance thereof), including when you use the Website;
- such processing is required by the laws of the countries in which we provide our Services or make them available;
- there is a significant public interest based on current legislation (for example, to prevent and detect illegal activities);
- you gave your Consent to Personal Data processing;
- processing is necessary for the purposes of any legitimate interests of Tviy, as the controller, or a third party (except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data).

Please note that the Website may contain hyperlinks (links) to external resources or third-party websites. We are not responsible for data processing by the respective third-party resources and websites. If you use such a hyperlink (link), first of all, carefully read the terms of processing and security of your Personal Data.

This Policy may be updated from time to time, including as required by applicable law. Tviy may additionally notify you of any changes to the Policy, either by sending notices by email if you provide us with your email address, and we will have the right to send you notifications or by posting notices on the changes on the Website. We suggest you review this Policy for any changes from time to time.

Please, remember that you can always delete or change your Personal Data, as well as exercise your other rights under applicable law and this Policy.

2. What Data do we process

Depending on how you interact with us, how you use the Website, and what services you use, Personal Data we collect and process may include the following:

- name and/or surname;
- contact details, in a particular e-mail address, telephone number, postal address (country, city, postal code, street);
- data collected from the feedback (contact us) form, as well as online chat (usually the name and email address);
- information about our Services you want to use or obtain the access, your Internet Protocol address (IP address), browser version, user browser setting, screen size;
- the consent and/or preferences we obtain from you as you use the Website, such as the communication method and language you prefer.

Some Personal Data may be obtained by Tviy from publicly available sources, for example, when such information is (a) available to the public and usually posted on the Internet; (b) lawfully made available to the general public, such as social media, public registries, etc.

In addition, we may process other Personal Data if you voluntarily provide it to Tviy, for example, when you send us a request, contact us through the Website.

Since we may change the Services we offer, the set of data we ask for specific processes may vary accordingly.

Please note that our services are not intended for persons under 18. Accordingly, we do not knowingly collect or process information about children. If you become aware of cases of use of the Website by children or that we receive Personal Data from children, please inform us immediately.

3. How do we obtain Personal Data

Tviy may obtain your Personal Data in a variety of ways and from various sources, including, but not limited to:

- when ordering and/or using our Services;
- when you subscribe to our news;
- when contacting us (via a unique form on the Website, by e-mail, phone).

We may collect information based on analyzing the actions taken while using the Website through cookies and similar technologies.

When Tviy receives any Personal Data from third parties (not from data subjects directly), such third parties are responsible for their compliance with the relevant data protection laws.

4. What is the purpose and legal basis for Personal Data processing

We process your Personal Data solely for the purposes provided for by the applicable law.

We process Personal Data for the following purposes with such legal basis (data may be processed on several legal bases):

- setting up and administering your Account on the Website (legitimate interest, conclusion of a contract);
- providing you with access to our Services and their further use (conclusion and/or performance of a contract);
- conducting internal research, development, testing and improvement of the features and functions of our Services (performance of a contract, legitimate interest);
- provision of customer support (conclusion and/or performance of a contract, legitimate interest);
- meeting our internal and external audit requirements, including our information security obligations, and if your employer is our customer and provides you with access to our Services to meet their internal audit requirements (Consent, in some cases, a legitimate interest);
- to personalize the User experience and allow us to provide the type of content and product offerings that are of most interest to you (Consent, in some cases, a legitimate interest);
- to contact you concerning participation in events (webinars, seminars, meetings, other similar events) held by Tviy in which you may be interested in connection with the use of the Services (legitimate interest, in some cases Consent);
- direct marketing and/or performance evaluation, including through a survey, and other manifestations of the Tviy's research activities (legitimate interest);
- administrative, analytical and statistical purposes (legitimate interest);
- to provide advertising information (Consent);
- notifying you, as a customer, of changes and other announcements related to the services (performance of a contract, legitimate interest);
- subscription and unsubscription management (Consent);
- protection against any malicious actions of Users (such as fraud, etc.), detection and/or investigation of a crime in connection with other security considerations of Tviy (legitimate interest, compliance with legal requirements);

- processing (consideration) of your inquiries and/or complaints and responses to them (legitimate interest, compliance with legal requirements);
- to respond the requests from data subjects, supervisory and/or law enforcement authorities (legitimate interest, compliance with legal requirements);
- ensuring other legitimate interests of Tviy, for example, to prepare a claim or respond to a received claim (legitimate interest).

The legal basis we are guided by when we process personal information from public sources for our Services is that such processing is necessary for our legitimate interests. In particular, when using our Services by the professional community, our legitimate interests include reducing the risk of fraud, creating a more secure business environment, and increasing corporate transparency, including information about the existence, ownership and activities of legal entities and related persons.

Where we rely on legitimate interests as the legal basis for processing your Personal Data, we will balance those interests with your interests, fundamental rights and freedoms, as required by applicable law and best industry practice.

5. Marketing settings

Tviy may provide you with marketing and event information in several ways, such as email, telephone, text messages, direct mailing and online (when using the Services or the Website).

It is mandatory for us to comply with both your marketing preferences and the requirements of applicable data protection laws. We process your Personal Data to send marketing materials where we have your express Consent or where there is a legitimate interest in direct marketing.

The information contained in direct marketing must not conflict with your interests. For example, from time to time, we may send you marketing materials about products and services that you may be interested in based on your interest in our services.

You can opt out of marketing even if you have previously given us Consent.

If you decide to opt out of marketing from us, you can contact us at any time. In particular, marketing emails received from Tviy will contain a special button or prominent link that will allow you to unsubscribe from receiving such communications in the future. You can also personalize your marketing settings in your Account on the Website. Or you can write a request to our data protection officer (the “DPO”), whose contacts are indicated in this Policy.

At the same time, even if you opt out of receiving marketing messages, we may send you service messages or essential information about transactions related to your accounts or subscriptions. This is necessary, in particular, for contract performance and customer support.

6. Exchange/disclosure of data and links of third parties

Following the standard practice that complies with the requirements of applicable data protection laws, your Personal Data may be transferred to third parties outside Tviy in such cases:

- when we have your Consent or at your request;
- state, federal and other regulatory, administrative or law enforcement authorities/agencies as a part of an official process (upon request);
- in response to a judgment or other decision of the court as a part of an official process;
- to establish or exercise the right of Tviy or an affiliate of Tviy to defend against your claims;
- to investigate and/or prevent fraud by the Users/customers;
- if we believe that it is necessary and/or in the interests of Tviy to protect or exercise its rights or the legal rights of other persons.

In some cases, we may need to transfer your Personal Data to third parties.

In particular, we may transfer your Personal Data, including but not limited to the contact and technical data, to third parties, such as service providers who perform various functions necessary for the operation of our Services.

Depending on the Services provided for the processing of Personal Data necessary for the operation of the Services, based on our instructions, under this Policy and data protection laws, we may transfer information to the following third parties:

- to our partners who provide customer service technologies and other joint functions of services maintenance;
- to our partners providing the support services necessary for the functioning of our Services, in particular, customer support services (processing customer requests through various communication channels), e-mail services, cloud services, marketing services, research services;
- to our partners providing services to detect and prevent fraud, as well as legal and financial (accounting) services;
- to our partners - payments processing companies (payment providers);
- to third parties to which we are obliged to disclose your Personal Data under the law (for example, state institutions, law enforcement agencies, and courts).

Our partners (suppliers of various services) are prohibited from processing Personal Data that we transfer for them for a specific purpose, for any purposes other than those specified by us as Data Controller. At the same time, we conclude contracts with such partners, demanding that they provide the same level of protection and security of your Personal Data that is required of us per the applicable law. We also limit the use of your Personal Data following any Consent provided by you (if Consent is the basis for Personal Data processing).

In the event of a merger, reorganization or a similar corporate event or the sale of Tviy or part of Tviy's assets, the information collected by us, including Personal Data, can be transferred to another company/organization (subject to merger or acquisition). Undoubtedly, all such Personal Data transfers will be carried out under the applicable data protection legislation and our confidentiality obligations, as specified in this Policy.

The Website may contain hyperlinks (links) to other third-party websites that do not belong to Tviy and are not controlled by Tviy. Tviy provides this content only for convenience, and including some links does not mean we approve this linked website. Remember that we are not responsible for using Personal Data by these websites and for their privacy policy. Tviy recommends being careful when you leave the Website and reading the privacy policy of each third-party website that collects and then processes your Personal Data.

7. International data transfer

Tviy is an international company that collaborates with various companies in different parts of the world to promote and/or provide customer access to its Services. Accordingly, your Data can be processed outside your country of residence, including countries that may not provide the same level of protection of your Data as your country.

In particular, Personal Data that we process in the context of our services are stored in the cloud environment.

When we transmit Personal Data to recipients in other countries outside the European Economic Area, Switzerland or Great Britain, we take measures to comply with the relevant legal and technological requirements, as described in this Policy and under the applicable legislation on data protection, including by the provisions of Articles 44-50 of General Data Protection Regulation (EU GDPR).

When transferring your Personal Data to third countries that do not apply to the “adequacy decision” of the European Commission, Tviy uses Standard Contractual Clauses, mandatory corporate rules, and special

agreements on data transfer and processing. In addition, we will require all data recipients to ensure the proper level of protection and security of your Personal Data that is required by the applicable data protection legislation.

In some cases, Tviy may need your explicit Consent to the International Data Transfer.

8. Data retention periods

We save your Personal Data during the time necessary to achieve the goals for which we have collected it, in particular, to satisfy any legal requirements, accounting or reporting, and to ensure the performance of contracts.

To determine the corresponding retention period for Personal Data, in addition to processing objectives, we also consider the volume, nature and category of Personal Data, the potential risk of harm from unauthorized use or disclosure of Personal Data, as well as the relevant requirements of the applicable legislation.

As a rule, we keep basic information about our Users for 3 (three) years after they have stopped being our Users (for tax and legal purposes).

Please note that the regulations of some countries may impose additional requirements, so the Personal Data retention period may vary. In particular, if the legislation of a country in which the User of our Services contains limitation period provisions that determine the period during which you can file a claim against us, and therefore we need the appropriate evidence of legal relations with you, we can process your Personal Data during this period.

We also need to consider the periods for which we may need to keep your Personal Data to comply with our legal obligations to you or regulatory authorities.

Eventually, we can minimize your Personal Data that we process or make it anonymous (for research or statistical purposes) so that it is no longer connected with you. If the Personal Data was anonymised, we could use this information indefinitely since it no longer contains Personal Data.

Suppose we process Personal Data with your Consent to processing (mainly for marketing). In that case, you have the right to withdraw Consent at any time or send us a request for Personal Data deletion or temporary termination of Personal Data processing. To do this, please get in touch with our DPO (see contact information below).

The Personal Data of individuals in the data set obtained from public sources will be published on the Website as long as they remain accessible on corresponding public sources. For example, if Personal Data about a person were deleted from the sanctions list, these data must also be deleted from our database.

9. Data protection methods

Tviy is very serious about the security of Personal Data. To ensure the secure storage of your Personal Data, we implemented many technical and administrative tools that protect Personal Data from any unauthorized or illegal processing, as well as any losses, destruction or damage. We regularly test our security measures to ensure they remain efficient and effective.

First, we use the usual scanning for malicious programs. The antivirus protection product we use is one of the best on the market.

When transferring Personal Data outside Tviy, we use encryption. We usually use different technical measures for information protection that we collect on the Internet or transmit to third parties, including encryption, firewalls and password protection.

The Personal Data you provided will be safely stored on our servers, inaccessible to the public.

Tviy adheres to the principle of minimizing data. We process information related to our Users/customers that we very need to perform certain functions and for the specific goals defined in this Policy. Your Personal Data is available only for a limited number of employees who need access to corresponding data to fulfill their functional duties. We constantly train the employees on our Policies, regulating data privacy and security issues.

We do our best to protect the Personal Data, but you need to know that no method of data transmission via the Internet or electronic storage is 100% secure. Therefore, we cannot guarantee its absolute security. If Tviy learns about the violation of the security system, we will inform you if we shall do this under the applicable legislation so that you can take appropriate security measures.

10. Confidentiality of financial information

We apply security measures when our customer orders services and makes payment to ensure Personal Data security.

All financial transactions are processed through the gateway provider, and the data for financial transactions are not stored or processed on our servers.

We use an external service provider to process the payments. These service providers allow the Website to process your online payments.

The online form, built into the Website, will send information for payments directly to the payment provider, which collects and processes payment information under its privacy policy. Only you can share the information necessary to perform transactions with the service provider that processes the transactions.

Tviy does not participate in the transaction processing. Nevertheless, we can receive consolidated information about all transactions made, including the transaction amount necessary to confirm the Services provided.

11. Cookies files and other tracking technologies

Cookies files are small text files that are placed on your device when you visit the Website. The Website, for a certain period, will remember your preferences and actions so that you do not have to configure them again. Our cookie files usually do not identify a specific User, but only identify the device used.

Cookies files and other tracking technologies on the Website can be used in different ways, for example, for the proper operation of the Website itself, tracking the traffic or advertising. In particular, we use cookies and other tracking technologies to improve the quality and efficiency of our Services and for security purposes.

To learn more about what cookies are, how they work, and how to manage or delete them, visit the website www.allaboutcookies.org.

12. Data subject's rights

According to the data protection legislation of the European Union, your rights regarding your Personal Data include:

- **Right of access** to your Personal Data (“Data Subject Access Requests”). This right gives you the opportunity to get a copy of your Personal Data that we process, as well as to find out detailed information about how and why we process this Personal Data. You can read the general information about what Personal Data we process and with what purpose in this Policy. If you want to know more and fail to find this information in Policy, you can request this information from us, in particular, contacting our DPO (see contacts in the next section below).

- **Right to rectification** gives you the opportunity to amend any incomplete or inaccurate Personal Data about you that we process. If you find some of your Personal Data that we process is incorrect or outdated, inform us of this, including contacting Tviy's DPO. However, in some cases, we will not be able to change your Personal Data. For example, when they were already used in the offer contract and/or contained in any written document issued and presented to us.
- **Right to erasure (“the right to be forgotten”) and withdraw the consent for your Personal Data processing.** This right gives you the opportunity to demand Personal Data deletion if Tviy has no legal grounds to continue their processing. If we process your Personal Data in accordance with the Consent to processing (in particular, for the purpose of marketing distributions), any further processing can be stopped at any time by withdrawing the Consent to the processing. In cases mentioned in Article 14 of GDPR, Tviy will delete processed Personal Data, with the exception of Personal Data that we must store in accordance with the law. At the same time, we will not always be able to fulfill your request for the deletion of Personal Data for specific reasons about which you will be informed in response to the request.
- **Right to object** to the processing of your Personal Data. This right gives you the opportunity to object if you think that our processing of your Personal Data affects your personal rights and freedoms. In some cases, we can demonstrate that we have significant legal grounds for processing your Personal Data that prevail over your rights and freedoms. you have the absolute right to object to Personal Data processing for direct marketing.
- **Right to restrict processing** of your Personal Data gives you the opportunity to suspend or restrict Personal Data processing. This means the requirement to stop any processing of your Personal Data, except for storage under certain circumstances, namely:
 - o you want us to establish Personal Data accuracy;
 - o if we illegally process your Personal Data, but you do not want to delete it;
 - o if you need to save Personal Data since such Personal Data is necessary to establish, exercise or defend a legal claim, even if we stopped processing such Personal Data;
 - o you objected to the processing of your Personal Data by us, but we must establish the predominant legal grounds to satisfy them.
- **Right to data portability** gives you the opportunity to request the transfer of Personal Data to you or the third party you choose in some cases. We provide Personal Data in a structured, common, machine-readable format. This right applies only to cases where Personal Data was received from you based on your Consent or for the conclusion and fulfillment of the terms of the contract with you.
- **Right related to automated decision-making, including profiling.** You have the right not to be subject to a decision based solely on automated Personal Data processing, including profiling, which has legal consequences or a significant impact on you.
- **Right to lodge a complaint.** The GDPR allows you to lodge a complaint with the respective supervisory authority (data protection regulator).

Please contact us if you would like to exercise any of your rights above.

Please note that all of these rights are always available to everyone. There are individual exceptions where some of these rights do not apply to the Personal Data we process depending on various factors including but not limited to your jurisdiction.

In the case of publicly available sources, there is an exception to the “right to be forgotten” if the processing is necessary to exercise the right to freedom of expression and information. If we become aware that a publicly available source removed (or made inaccessible) certain information about you due to exceptional circumstances (for example, due to a serious risk to personal safety), we will promptly update the records.

You may notify us of any request made to public sources to remove or restrict access to your Personal Data by submitting a request to us. Your request must contain the relevant URLs and full details of the reasons for the request for such removal or restriction.

Any additional information collected for verification purposes will only be used to verify identity.

We process requests as quickly as possible, but at the same time, we ask you to remember that providing a complete and lawful response to Personal Data is a complex process that can take up to one month or even longer. If we need more time to prepare a complete response, we will let you know.

13. Compliance with CPRA, GDPR and other laws

We demonstrate the highest degree of use of standards that are set by legislation and best practices in the field of data protection to comply with applicable data protection laws.

If you are located in California, all processing of Personal Data is performed in accordance with regulations and rules following the California Privacy Rights Act, Cal. Civ. Code § 1798.100 et seq. (CCPA).

If you are located in the European Economic Area (EEA) privacy rights are granted and all processing of Personal Data is performed by regulations and rules following the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons concerning the processing of Personal Data and on the free movement of such Information, known as the General Information Protection Regulation (GDPR).

If you are located in Brazil, all processing of Personal Data is performed in accordance with regulations and rules following the Lei Geral de Proteção de Dados.

If you are located in the United Kingdom, all processing of Personal Data is performed in accordance with regulations and rules following the Information Protection Act 2018 and UK General Information Protection Regulation.

If you are located in Australia, all processing of Personal Data is performed in accordance with regulations and rules following the Privacy Act 1988.

If you are located in Canada, all processing of Personal Data is performed in accordance with regulations and rules following Personal Data Protection and Electronic Documents Act (S.C. 2000, c. 5).

If you are located in New Zealand, all processing of Personal Data is performed in accordance with regulations and rules following Privacy Act 2020.

14. Our contacts

If you have any questions or would like to lodge a complaint about this Policy or in relation to our use of your Personal Data, please contact us.

We have appointed a Data Protection Officer (DPO) who is the contact person for any questions or comments regarding the protection and processing of your Personal Data.

You can contact us by sending an email to the following address: info@tviyit.com.