

The Administration of the TEMA UA website www.thetema.net (hereinafter referred to as the Administration) constantly cares about ensuring the standards of protection, use and processing of personal data and the protection of their confidentiality.

In order to maximize your rights and protect your personal data, we have developed the following Privacy (Personal Data Processing) Policy to inform you of how any personal data that you provide or that we collect from you will be used.

References to "you" or "your" refer to individuals whose personal data are processed by the Administration in connection with the provision of services to potential and actual customers; transactions in which the Administration is a party; or related to services provided by third parties to the Administration..

Platform Administration (as well as "We", "Our") means the platform owner - TEMA UA Limited Liability Company and the persons who have contractual relations with the company and whose competence includes the administration of the platform under the direction of the owner.

We will collect, store, use and disclose personal data in accordance with the current national legislation of Ukraine, international legal acts related to the protection of personal data, with all amendments and additions.

Please read our Privacy Policy carefully. If you do not agree with its provisions, you must stop using the TEMA UA Platform (hereinafter referred to as the Platform). If you continue to use the Platform, you will be deemed to have fully and unconditionally accepted the terms and conditions of the Privacy (Personal Data Processing) Policy.

Last update date: August 29, 2022

Privacy Policy

(personal data processing)

1. Responsible person for the collection, processing and storage of personal data.

1.1. The Administration guarantees the collection, processing and storage of your personal data in accordance with the requirements of current legislation and international legal acts.

1.2. Ensuring security of personal data is an obligatory and integral part of business activities conducted through the Platform.

1.3. The contact person for the protection of personal data is **Anatoly Anatolyevich Garmash**

1.4. If you have any questions, suggestions and/or comments on the protection of personal data, please send a corresponding letter by e-mail to support@thetema.net or mail to: Ukraine, 62303, Kharkov region, Dergachy, Vinogradoviy 32 .

2. Personal data that the Administration collects, processes and stores.

2.1. Personal (Personal) Data is information relating to a person that can be used alone or with other sources of information to identify that person. Personal data does not include information in which a reference to a specific person or a specific piece of information has been removed, and therefore such information is anonymous/unidentifiable.

Sensitive personal data is a category of personal data that includes data relating to race or ethnicity, religious or philosophical beliefs, sexual life, sexual orientation, political views, trade union membership, health information, and genetic and biometric data.

The nature of the information collected will depend on the services provided and the legal relationship with you.

2.2. The Administration may obtain and use the following data::

2.2.1. Information about the device (computer, tablet, smartphone) and the user's activity, which includes:

- Options and settings: time zone, language and character size.
- Identifiers: IP address.
- Technical information: device type, operating system name and version, device manufacturer, browser information (type, version), screen resolution.

- Coarse geographical information: geographical location (location data) derived from the IP address.

2.2.2. Traffic data, which include the following components:

- Information about using the Platform: timestamp, URL of the visited page, URL of the last visited page before visiting the Platform and its pages, Cookies.

- History of interaction with the Platform and its pages: pages viewed; time spent on the page; click-throughs; inline data; requests made; search history; selected search results; comments made, type of service requested.

2.2.3. Personal information that is collected on the basis of the user filling out the forms on the Platform, or by submitting a request, conducting correspondence, entering into contracts, and as a result of the user's individualized interaction with the Administration and other users. Depending on the circumstances, information may include:

- Any correspondence that is created based on your request to the Administration and/or other users.

- Surname, first name, patronymic (middle name).

- Контактный номер телефона.

- Email address (e-mail).

- Age, including date, month and year of birth.

- Country and city of residence.

- Information about education (including, but not limited to, program of study; field of study; academic degree).

- Occupation and place of work.

- All data specified in the social media account, including, but not limited to social networks such as: Facebook, Google, LinkedIn (if registration is made by authorization through a social network or other electronic service).

- Information about the browser used.

- User avatar (photo).

- Other data required by the Administration to fulfill the obligations under the contractual relations and the requirements of applicable law.

2.3. Data and email transmissions over the Internet are usually unencrypted, so they are not protected from third-party access.

When contacting the Administration by email, the confidentiality of the information provided cannot be guaranteed when transmitting it.

Therefore, we recommend that confidential information be sent only through postal channels.

2.4. The administration has the right to use email address, contact phone number, account information in social networks, messengers and other channels of communication and communication reported by you - to send promotional information about services.

You may receive advertising information from the Administration through the following channels:

- Calling and/or texting on a cell phone;
- Call and/or message Viber; WhatsApp; Telegram; Facebook Messenger;
- Posts on social networks - Instagram, TikTok, YouTube;
- The letter was sent to an email address;
- Push messages in the browser, etc.

Please note that by agreeing to the terms of this Privacy Policy, you consent to the sending of advertising information by all communication channels known to the Administration.

You may unsubscribe at any time as set forth in this Privacy Policy.

3. Purposes of personal data processing

3.1. The Administration processes users' personal information for the following purposes::

3.1.1. User identification on the Platform.

3.1.2. Establishing and maintaining communication between the user and the Administration, advising on the provision of services and functionality of the Platform.

3.1.3. Fulfillment by the Administration of the obligations stipulated in the agreements between the user and the Contractor, and/or another user.

3.1.4. Sending promotional messages to the user; targeting promotional materials.

3.1.5. Conducting statistical and other studies based on anonymized data.

3.1.6. Optimizing marketing solutions.

3.1.7. Analysis of the quality of the Platform and its individual textual, graphical and functional elements.

4. Platform user rights

4.1. The rights of users of the Platform include the following:

4.1.1. Request information about what data the Administration stores about you in the manner prescribed by applicable law of Ukraine.

4.1.2. Demand correction, removal and restriction of processing (blocking) of your personal data, if it is legally permissible and possible within the existing contractual relationships and the technical capabilities of the Platform and the Administration.

4.1.3. Contact the Personal Data Protection Officer in the manner prescribed by this Privacy Policy and applicable law.

4.1.4. Transmit personal data on the basis of the expressed consent or contractual relationship with the Administration in the manner prescribed in Section 6 of this Privacy Policy.

4.1.5. Revoke and withdraw consent to the processing of personal data at any time. Withdrawal of consent does not affect the legitimacy of processing because of the consent before it is withdrawn.

4.1.6. To unsubscribe from the promotional newsletter by sending a free-form letter to the address specified in paragraph 4.2. of this Privacy Policy or by using the unsubscribe procedure specified at the end of the promotional letter.

4.2. In order to exercise your rights, send an e-mail to support@thetema.net or mail to: Ukraine, 62303, Kharkov region, Dergachi, Vinogradoviy 32.

5. Warranties and Responsibilities of Platform Users.

5.1. You represent and warrant that you have the right to transmit your personal data to the Administration in order to obtain services, and that you are fully responsible for obtaining all necessary consents from third parties (if necessary) to transfer the Administration of their personal data.

5.2. You may not provide the Administration with any personal data or other information containing personal data of third parties unless you obtain from them the necessary consent or permission for such actions.

5.3. You are personally responsible for ensuring that all third parties are aware of and accept the terms of this policy before giving consent or permission for you to use their personal data.

5.4. You agree to reimburse the Administration reasonable expenses associated with the settlement of any claims made by third parties as a result of unauthorized access, accidental loss, damage or disclosure of personal data of these individuals, if such claims are associated with your actions that violate the provisions of this Privacy Policy and applicable laws of Ukraine.

6. Procedure for disclosure of personal data to third parties by the Administration.

6.1. Your data may be disclosed to third parties only subject to your voluntary consent and/or legal grounds provided by the applicable laws of Ukraine.

6.2. The Administration may transfer impersonal statistical data to third parties to conduct research, perform work or provide services on behalf of the Administration.

6.3. External service providers processing data for the Administration are carefully selected by us and act in accordance with applicable laws and our guidelines, which are enforced by strict contractual rules, technical and organizational measures and additional controls.

6.4. Transboundary transfer of personal data by the Administration is not carried out in the absence of appropriate safeguards for their storage.

7. Using Cookies

7.1. The Administration uses cookies on the Platform. "Cookies" are small text files in which you can store personal data.

7.2. The notification of the Administration about the protection of personal data posted on the Platform is intended to provide full information about their collection and processing, to allow you to make an informed decision about the appropriateness of disabling cookies, unless it is absolutely necessary for the technical functioning of the Platform, or their use.

7.3. The Administration informs you of the type and extent of the use of Cookies on the Platform, the operation of which is usually possible without the use of such files, only if they are not used for functional technical purposes.

7.4. Вы можете запретить отслеживание файлов Cookies, изменив настройки браузера или предотвращая сохранение файлов Cookies третьими сторонами.

Below are links to the procedure for disabling cookies in the most common and used browsers:

Google Chrome	http://www.google.com/support/chrome/bin/answer.py?hl=en&answer=95647
Internet Explorer	https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies
Microsoft Edge	https://support.microsoft.com/en-us/help/4468242/microsoft-edge-browsing-data-and-privacy-microsoft-privacy
Safari	https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac
Mozilla Firefox	https://support.mozilla.com/en-US/kb/cookies-information-websites-store-on-your-computer
Opera	https://help.opera.com/ru/latest/web-preferences/#cookies

7.5. The Administration uses cookies that are collected from the beginning of your visit to the Platform until they expire.

These cookies can be roughly divided into the following categories:

Required (mandatory) Cookies – provide usability of the Platform, allowing you to implement basic functions such as: session storage, desired language, user settings. The Platform cannot function properly without these cookies, so it is not possible to disable them.

Statistical Cookies - help the Administration determine how users interact with the Platform by collecting and processing impersonal data. Statistical data includes, among others, Google Analytics Cookies, Yandex Metrika.

Marketing Cookies - are used to track the movement of users across sites. The purpose of such actions is to show ads that are relevant to specific users (target audience), which in turn increases the value of the collected information for publishers and third-party advertisers. Facebook Pixel Cookies are among the marketing ones..

Cookies for authentication: they are necessary to remember users. Thanks to such files the User does not need to enter authorization data when visiting the Platform again..

7.6. The administration uses the following cookies:

Title	Purpose	Retention period	The company or service that stores cookies	Procedures and consequences of disabling cookies
SESSION	To maintain constant communication with the user of the Platform	2 hours	Administration	Disconnection can be done directly in your browser. Once disconnected, the Platform may operate with restrictions.
language	To save the Platform language settings selected by the user.	2 years	Administration	Disabling can be done directly in your browser. After disabling, the server will not be able to save your language

				settings on the Platform.
cookie-accept	To confirm that you are familiar with the use of the Platform Cookies.	2 years	Administration	Disabling can be done directly in your browser. Once disabled, your consent to the use of cookies by the Platform cannot be saved.
facebookPixelCookies	To save the settings selected by the user of the Platform in order to allow or deny the use of Facebook Pixel Cookies.	2 years	Administration	Disabling can be done directly in your browser. Once disabled, you will not be able to save your settings to allow or disallow the use of Facebook Pixel Cookies.

<p>googleAnalyticsCookies</p>	<p>To save the settings selected by the user of the Platform in order to allow or deny the use of Google Analytics Cookies.</p>	<p>2 years</p>	<p>Administration</p>	<p>Disabling can be done directly in your browser.</p> <p>Once disabled, you will not be able to save the settings to allow or disallow the use of Google Analytics Cookies.</p>
<p>_ga</p>	<p>For the permission of users of the Platform.</p>	<p>2 years</p>	<p>Google Analytics</p>	<p>Disabling it can be done directly in your browser. The collection of Google Analytics statistics can work with errors.</p>
<p>_gid</p>	<p>For the permission of users of the Platform.</p>	<p>24 hours</p>	<p>Google Analytics</p>	<p>Disabling it can be done directly in your browser. The collection of Google Analytics statistics can work with errors.</p>

_gat	To limit the frequency of requests.	1 minute	Google Analytics	Disabling it can be done directly in your browser. The collection of Google Analytics statistics can work with errors.
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7.7. The Administration for the collection, processing and storage of personal data uses third-party services, namely:

- Google Analytics;
- Google Tag Manager;
- Google Optimize;
- Facebook Pixel;
- LinkedIn.

7.7.1. To form a comprehensive view of the collection, use and processing of your personal data by the services mentioned in paragraph 7.7. we recommend to visit the following links:

Google Analytics Google Tag Manager Google Optimize	https://policies.google.com/privacy
Facebook Pixel	https://developers.facebook.com/docs/facebook-pixel/implementation/gdpr

LinkedIn	https://ru.linkedin.com/legal/cookie-policy?trk=homepage-basic_footer-cookie-policy
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8. Terms and order of storage of personal data

8.1. The Administration shall take all necessary, available, possible and sufficient measures to protect personal data from unauthorized or accidental access, destruction, perversion, blocking, copying, distribution, as well as from other unlawful actions with them by third parties. The storage of personal data shall be ensured with maximum protection..

8.1.1. The Administration stores personal data on the servers of digitalocean.com and in the Administration database.

To learn more about how personal data is stored on digitalocean.com servers, we recommend that you visit the following link: <https://www.fendahl.com/gdpr-data-protection-statement>

8.2. Personal data collected is kept as long as necessary to fulfill the purposes for which it was collected or as required by applicable law.

8.2.1. The Administration will retain your personal data as part of the contractual relationship until the complete termination of the contract and the expiration of the three-year period prescribed by applicable law for the storage of this type of documents.

8.2.2. All other personal data you have provided will be deleted within the time frame required by applicable law, as soon as it is no longer needed for the purposes for which it was collected.

8.2.3. Your personal data will be deleted as soon as it is determined that it is not allowed to be stored (in particular if the data is inaccurate and correction is not possible). If legal or practical obstacles prevent deletion, the data are blocked (e.g. special archiving obligations).

8.2.4. Destruction of personal data is also carried out by the Administration in the presence of the grounds set forth in Article 15 of the Law of Ukraine "On Protection of Personal Data.

9. Other provisions

9.1. All possible disputes between the users and the Administration shall be resolved in accordance with the requirements of the current legislation of Ukraine at the place of registration of the Limited Liability Company "TEMA UA"

9.2. In the event of any disputes or disputes between users and the Administration, they must be resolved by applying the mandatory pre-trial procedure provided by the current legislation of Ukraine.

9.3. If one or more provisions of this Privacy Policy are found to be invalid or unenforceable, the other provisions of this Privacy Policy will not lose their validity and applicability.

9.4. The Administration constantly adapts the Privacy Policy to the changed functionality of the Platform, the updated current legislation of Ukraine and international legal acts.

Changes in the Privacy Policy are made by the Administration without the prior consent of the users of the Platform and come into force from the date of publication on the Platform.

9.5. By agreeing to the terms of this Privacy Policy, you agree to keep it up to date.