

**Version of 01.05.2024**

**GDPR and Privacy are important to BEGET CLOUD LTD and its business relationships. This Privacy Statement informs you about the practices of BEGET CLOUD LTD as a service provider regarding the possible processing of personal data when entering into a contract with you ("Personal Data").**

## **COMPLIANCE WITH INTERNATIONAL DATA PROTECTION LAWS, IN PARTICULAR THE EU GENERAL DATA PROTECTION REGULATION**

BEGET CLOUD LTD complies with the EU Data Protection Regulation 2016/679/EU ("GDPR"). BEGET CLOUD LTD has implemented the following requirements in accordance with the GDPR, including, but not limited to:

- Information about our Personal Data processing activities.
- Appropriate organizational and technical security measures.
- Request forms and internal instructions for ensuring privacy by design and by default, data subject rights, such as the right to be forgotten.
- Data processing agreement in our role as a data controller and data processor.
- Personal data breach procedure.
- BEGET CLOUD LTD internal privacy policy.

## **WHEN BEGET CLOUD LTD MAY PROCESS YOUR PERSONAL DATA IN OUR ROLE AS DATA CONTROLLER**

BEGET CLOUD LTD may process your Personal Data obtained directly from you when:

- You order a service from BEGET CLOUD LTD.
- You participate in a BEGET CLOUD LTD promotion.
- You participate in a BEGET CLOUD LTD survey.
- You subscribe to receive BEGET CLOUD LTD informational messages.
- You request BEGET CLOUD LTD to provide additional information about BEGET CLOUD LTD services or send a question, comment, or complaint to BEGET CLOUD LTD.
- You report an incident to BEGET CLOUD LTD.
- You use BEGET CLOUD LTD service, infrastructure, and/or other BEGET CLOUD LTD services.

Additionally, BEGET CLOUD LTD may process your Personal Data obtained from our partners, your representatives, or third parties.

## **WHAT PERSONAL DATA BEGET CLOUD LTD MAY PROCESS ABOUT YOU AS A DATA CONTROLLER**

BEGET CLOUD LTD may process the following information about you:

- Names of your company's contact persons, address, phone number, email address, company registration and identity documents, which may include a photo and personal identification numbers such as the contact details of legal representatives.
- Your first name, last name, patronymic, phone number, email address, identity documents which may include a photo and personal identification numbers, date of birth, registration or residence address.
- Information about your BEGET CLOUD LTD account, such as the services you ordered from BEGET CLOUD LTD, domain name registration information, assigned IP addresses, your customer ID, details of your balance and service charges from BEGET CLOUD LTD, use of BEGET CLOUD LTD services or any other information related to your account.
- Your contacts with BEGET CLOUD LTD – for example, records of all calls you make to BEGET CLOUD LTD, chat records when you chat with BEGET CLOUD LTD, any emails or letters you send to BEGET CLOUD LTD, or other records of any contact you have with BEGET CLOUD LTD.
- Information about your payment method, such as credit card number, bank account number, or other banking information.
- Information you provide to BEGET CLOUD LTD when you notify BEGET CLOUD LTD of (suspected) service violations.
- Video recordings of you in public areas outside and inside our offices.
- Your biometric data, such as a photo, when identifying your identity, to gain access to your account.
- Documents and information verifying your identity.

## **WHY BEGET CLOUD LTD PROCESSES YOUR PERSONAL DATA IN THE ROLE OF DATA CONTROLLER**

BEGET CLOUD LTD may process your Personal Data for:

- Processing your orders, requests, service agreements, which may include customer verification.
- Interacting with partners to purchase the services you ordered and communicating with partners to provide information about BEGET CLOUD LTD services.
- Conducting market research, customer retention and satisfaction surveys, (direct) marketing activities (including sending letters and emails, on social networks, on the BEGET CLOUD LTD website, both online/offline), sales activities (including individual offers and quotes, and promotions).
- Communicating with customers, including: (i) providing information about BEGET CLOUD LTD services, (ii) providing information about offers, orders and service agreements, contract status and payment, (iii) providing support and service. services, (iv) processing complaints, and (v) responding to inquiries from (potential) customers.

- Conducting financial processes, including (i) calculating service fees and collecting payments for services, (ii) processing financial transactions related to accepting orders, and (iii) providing debt collection rights to third parties.
- Investigating and processing suspected service violations.
- Conducting legal processes and complying with legal requirements, including court proceedings, evidence collection processes, and court order enforcement.
- Complying with statutory obligations, including (i) providing data to authorized law enforcement agencies, (ii) complying with applicable data retention obligations, and (iii) providing third parties with client data in connection with violations of third party rights.
- Identifying clients or third parties.

## TRANSFER OF YOUR PERSONAL DATA TO THIRD PARTIES IN THE ROLE OF DATA CONTROLLER

BEGET CLOUD LTD may transfer your Personal Data:

- To partners involved in providing services ordered through BEGET CLOUD LTD.
- To domain name registries when BEGET CLOUD LTD registers a domain name on your behalf.
- To law enforcement agencies, regulatory bodies, courts, or other government agencies, attorneys as provided by law.
- To BEGET CLOUD LTD customers if you notify BEGET CLOUD LTD of the need to transfer your data to fulfill your request as part of providing services to you.

## STORAGE PROCEDURES

BEGET CLOUD LTD will retain your Personal Data for as long as necessary to achieve the processing purposes specified in this Privacy Statement. BEGET CLOUD LTD will delete the Personal Data processed by us or restrict processing in accordance with legislative provisions, particularly in accordance with Articles 17 and 18 of the GDPR. Unless explicitly stated otherwise in this Privacy Statement, we will delete stored data as soon as it is no longer required for its intended purpose. Personal Data will be retained after it is no longer necessary to achieve the purposes specified in the Privacy Statement if it is necessary for other legally permissible purposes or if Personal Data must be retained in accordance with statutory retention obligations. In such cases, processing is limited, namely blocked and not performed for other purposes, and your Personal Data is stored as long as necessary to achieve the purposes specified in this Privacy Statement, unless otherwise provided by law. Thus, the exact retention period of your Personal Data may vary in each case.

## LEGAL BASIS

For processing your Personal Data as described above, we rely on the following legal bases:

- Performance of a contract (Art. 6 (1) b) GDPR): the use of your information may be necessary for the performance of a contract concluded between you and us. For example, if

you use our services, we will use your information to fulfill our obligations to provide and administer this service in accordance with the contract concluded with you.

- Legitimate interests (Art. 6 (1) f GDPR): processing is necessary for the purposes of our legitimate interests, such as information security. We also strive to provide you with the most relevant content through our website and/or emails to improve and promote our products and services, as well as to improve our administrative functions, fraud detection and legal purposes, and for sales and marketing processes with BEGET CLOUD LTD partners.
- Consent (Art. 6 (1) a) GDPR): Regarding marketing advertising (excluding operational communication within the framework of services), you may withdraw your consent at any time.

## **CONSENT TO RECEIVE DIRECT MARKETING COMMUNICATIONS AND WITHDRAWAL OF CONSENT**

You can decide whether to provide us with certain Personal Data (if any) for direct marketing purposes. However, if you choose not to provide certain Personal Data or withdraw your consent later, you may miss out on beneficial offers and promotions organized by BEGET CLOUD LTD. You have the right to withdraw your consent to receive direct marketing communications by sending an email to the email address provided below. After receiving your opt-out request, we will exclude you from the direct marketing list.

## **TECHNICAL AND ORGANIZATIONAL SECURITY AND DATA TRANSFER PROCEDURES**

In accordance with international data protection laws, particularly the GDPR, we adhere to adequate procedures to prevent unauthorized access and misuse of Personal Data. BEGET CLOUD LTD uses appropriate business systems and security procedures to protect Personal Data. For example, network segmentation, antivirus software, encrypted communication via SSL or VPN, security information and event management solutions, security training, secure deletion tools, secure development training, role-based access separation (based on least privilege), integrated security monitoring during development, and tools to help employees work securely (e.g., password managers).

In addition, BEGET CLOUD LTD applies technical and physical restrictions to any access and use of Personal Data on our servers. For example, only authorized personnel are allowed access to Personal Data during their work.

## **YOUR RIGHTS**

In accordance with data protection laws, you have a number of rights regarding your Personal Data and its processing:

- You can view and, if necessary, change your Personal Data in your account at any time if needed.
- You can request the processing of your Personal Data.

- You also have the right to request the deletion of your Personal Data after the termination of the Service Agreement ("Right to be forgotten") if and to the extent that it is duly necessary and permitted.
- Additionally, in certain circumstances, you may have the right to restrict the processing of your Personal Data if and to the extent that it is properly required and permitted.
- You have the right to object at any time, for reasons related to your particular situation, to the processing of your Personal Data.
- You have the right to object to the processing of your Personal Data for direct marketing purposes (e.g., in an email or by phone) by using the opt-out link in emails and/or withdrawing consent by sending a corresponding letter to our email address.
- You have the right to receive your Personal Data that you provided to us in a structured, commonly used, and machine-readable format and have the right to transfer this data to another controller when processing is based on your consent or is necessary for the performance of a contract (data portability).
- You have the right to object at any time, for reasons related to your particular situation, to the processing of your Personal Data based on Art. 6 (1) e) or f) GDPR, including profiling. If Personal Data is processed for direct marketing purposes, you have the right to object at any time to the processing of Personal Data for such marketing, including profiling.

If you have any requests regarding the above, please contact us using the email address and contact information below. If we do not fulfill your request, we will inform you of the reason.

## **RIGHT TO LODGE A COMPLAINT WITH A LOCAL SUPERVISORY AUTHORITY**

You have the right to lodge a complaint with your local supervisory authority if you have concerns about how we process your Personal Data. We ask that you first attempt to resolve any issues with us, although you have the right to contact your supervisory authority at any time.

## **CHANGES TO THE STATEMENT**

BEGET CLOUD LTD may occasionally amend or supplement this Privacy Statement as our business practices and legal requirements develop. If this Privacy Statement is amended, BEGET CLOUD LTD will notify you of the change by posting the updated Privacy Statement on the BEGET CLOUD LTD website [beget.com](https://beget.com). BEGET CLOUD LTD advises you to regularly check this information to see if any changes have been made.

## **CONTACT INFORMATION**

If you have any requests, questions, or suggestions regarding BEGET CLOUD LTD's privacy policy, please send an email to [support@beget.com](mailto:support@beget.com).