

## **PRIVACY POLICY**

**Silencesoft LTD**, owner of web-site [www.silencesoft.io](http://www.silencesoft.io) (hereinafter – SITE), informs its USERS on privacy policy applied on the SITE with regard to USER personal data.

This Privacy POLICY (hereinafter – Policy) is based on norms of international legislation in the area of personal data protection. These principles and norms shall be applied at processing of USER personal data when using SITE for protections of USER personal life.

This POLICY aims to ensure and guarantee informing of all USERS on what personal data on users and visitors are collected by SILENCESOFT, how it is done and with what purposes.

This POLICY shall be applied to all information submitted by USERS (all individuals visited SITE) to SILENCESOFT.

Utilization of SITE and supply of personal data via SITE means unconditional agreement of USER with this POLICY. If USER does not agree with these conditions, he or she shall abstain from using SITE.

This POLICY uses the terms in accordance with the international and local legislation applicable to SILENCESOFT (hereinafter referred to as the Legislation).

### **1. USER PERSONAL DATA**

1.1. SILENCESOFT collects and processes personal data of USERS with their express consent in order to provide services and sell software.

1.2. Personal data means any information relating to the USER.

1.3. Processing of personal data - any action or set of actions performed with personal data, including the collection, systematization, storage, modification, use, depersonalization, blocking, distribution, provision, deletion of personal data.

1.4. Personal data collected by SILENCESOFT with the above purposes include (but not limited to) data, which USERS specify on their own at registration and verification on SITE (Full name, data of the USER's documents, e-mail address, telephone number, etc.), as well as data, which are automatically collected by SITE; geographic location data, data on devices used by USERS visiting SITE, as well as on internet connection type.

*1.5. By agreeing to this POLICY, the USER consents to the processing of the following personal data of the USER:*

1.5.1. any data, which allow to directly identify USER (for example, real name of user, e-mail address, phone number, etc.);

1.5.2. any data, which on the basis of which it is possible to identify USER separately or in combination of other available information;

1.5.3. other information obtained during USER identification and verification;

1.5.4. technical information on hardware used (IP-address, software version, etc.);

1.5.5. data on USER behavior and procedure of SITE;

1.5.6. any other additional data, which was voluntarily submitted by USER in the framework of using SITE, as well as received by SILENCESOFT from other sources in accordance with the Legislation.

*1.6. By agreeing to this POLICY, the USER consents to SILENCESOFT performing the following actions with the USER's personal data:*

1.6.1. collection of personal data in the process of identification and verification of the USER - is carried out in accordance with the requirements of the Legislation;

1.6.2. systematization, storage, depersonalization of personal data for the purpose of performing the provision of services and selling software - is carried out in accordance with the business processes of SILENCESOFT;

1.6.3. the use of personal data for the purpose of performing the provision of services and licensing software, as well as the Legislation. The use of personal data is limited to the purposes established by this POLICY;

1.6.4. change, blocking, deletion of personal data - within the framework of the current

Legislation, including at the request of the USER or other authorized persons;

1.6.5. provision, distribution of personal data - for the purposes of providing services and licensing software. The provision of personal data of the USER is possible only within the framework of the purposes stated in this POLICY. The distribution of the USER's personal data is possible only at the request of an authorized person in accordance with the Legislation.

## **2. PRINCIPLES OF USER PERSONAL DATA PROCESSING**

2.1. SILENCESOFT strives to protect private life of USERS and their confidentiality right when processing personal data regardless of any ways and methods to collect such data taking into account the following principles of their processing:

### **2.1.1. Obtaining consent.**

Personal data is processed after obtaining the consent of the USER on the basis of the norms of the Legislation. If the USER does not agree with the processing of personal data, it is necessary to refrain from using the SITE.

### **2.1.2. Legality, justice and transparency.**

The processing of personal data is carried out in accordance with the Legislation, fairly and transparently for the USER.

### **2.1.3. Purpose restriction.**

Personal data is collected and processed in order to achieve specific, pre-declared legitimate purposes.

### **2.1.4. Data minimization.**

The processing of the USER's personal data (including the volume and content of the collected data) must be adequate (proportionate) and relevant to the stated purposes and ensure a fair balance of interests of all interested parties at all stages of such processing. SILENCESOFT strives to collect the minimum amount of information that is necessary to complete the task.

### **2.1.5. Storage limitation.**

The storage of personal data of USERS is carried out for the period necessary to achieve the stated goals.

If the use of the stored data is no longer necessary, SILENCESOFT will take measures to destroy or terminate the processing of USERS' personal data within a reasonable time, taking into account the functional and legal requirements regarding the storage and confidentiality of personal data.

### **2.1.6. Accuracy.**

Personal data must be accurate, true, complete and up-to-date in order to achieve the purposes of their processing. SILENCESOFT takes measures to ensure the accuracy of the processed personal data.

At the request of the USER, personal data that is inaccurate must be deleted or corrected. If necessary, SILENCESOFT will take steps to change or delete incorrect or incomplete data.

### **2.1.7. Transparency.**

SILENCESOFT openly informs about the fact of collecting personal data of USERS, the purposes of collecting and processing personal data

### **2.1.8. Integrity and confidentiality.**

Personal data must be processed in a manner that ensures their security, including protection against unauthorized or unlawful processing, as well as against accidental loss, destruction or damage.

## **3. TYPES OF USER PERSONAL DATA**

3.1.1. Data independently populated by USERS (if necessary):

- FULL NAME;
- telephone number;
- E-mail address;
- citizenship;
- Date and place of birth;

- place of residence and (or) stay, copies of supporting documents;
- details of the identity document;
- data provided during video/audio conferences with the USER, recordings of the specified video/audio conferences;
- other data determined by SILENCESOFT in accordance with the requirements of the Legislation.

### **3.1.2 Data automatically collected when using services:**

3.1.2.1. *Technical data on device and internet connection.* With the help of server logs and other tools SILENCESOFT shall register data on device used by USER and the way the device is connected to SITE, including data on operation system, browser version, IP-addresses, and unique identification files. Usually the data are used to obtain anonymous (depersonalized) and aggregate statistics, but it also can be linked with USER account (profile). This information gives possibility to analyze how services are used, and adjust them to USER device so that to simplify and make more comfortable SITE utilization.

3.1.2.2. *Data on service utilization.* When USER uses SITE functionality, the information on that is registered in server logs. SILENCESOFT shall use the information to prevent service misuse, law offences and crimes, improve services, ensure display of personalized and relevant content.

3.1.2.3. *Location data.* When USER uses SITE, SILENCESOFT identifies approximate location of USER based on IP-address. This information is used, for example, for statistical research, as well as to display up-to-date data, advertisements, and other personalized content.

3.1.2.4. *Cookie files and other locally stored content.* When USER uses SITE, SILENCESOFT shall use various tools to recognize USER and simplify use of the SITE. Cookie file is a small file of data (text fragment), which is transferred to USER browser from SITE. Such files contain information, which SITE afterwards may read and simplify for USERS SITE and its services utilization.

3.1.2.5. *Data from other sources.* SILENCESOFT may receive data from other sources, for example, from advertisement partners, resources and tools for collection of third party statistical data, which help to analyze user activities, preferences and improve SITE services. SILENCESOFT may receive data from partners, for example, on what will be going on after USER presses advertisement banner on SITE. Such information allows evaluating efficiency of banner advertisement and make it more relevant for USERS.

## **4. PURPOSE OF PERSONAL DATA USAGE**

4.1. SILENCESOFT shall process USER personal data for USER identification and verification, as well as for other aspects of provision of services and software licensing, service improvement and development, as well as for provision of personalized recommendations and proposals, personalized content, prevention of violations attempts, as well as in commercial (advertisement, marketing) purposes. Personal data shall be used for analytical purposes: to understand market trends. SILENCESOFT stores all comments and suggestions sent by USERS to SILENCESOFT, as they help to improve the services provided.

4.2. SILENCESOFT stores information provided by USERS when contacting support or other services of SILENCESOFT in order to be able to contact USERS and provide a response to the request. SILENCESOFT stores all comments and suggestions sent by USERS to SILENCESOFT, as they help to improve the services provided.

4.3. SILENCESOFT shall recommend USERS content and services based on their behavior and interests. SILENCESOFT shall also use personal data to setup banner advertisements and other commercial content on SITE according to USER preferences. Based on such information advertisement campaigns will be run. Advertisers placing banner advertisements on SITE can get access to USER personal information and user preferences to display banner advertisement relevant for USER, however it is strictly prohibited for them to use the data in other purposes other than placement of banner advertisement on SITE.

4.4. From time to time, SILENCESOFT shall send to USERS marketing letters (mailing) via e-mail or other channels (for instance, in social networks), if USER has not unsubscribed from such mailing.

The mailing may contain information on special offers from third parties.

4.5 SILENCESOFT shall use personal data of USERS so that to offer personalized services relevant to USER needs and interests, as well as for improvement of SITE interface. Information collected with this purpose shall be aggregated and anonymized. However, this information SILENCESOFT may also use not in anonymous form in solving technical issues that certain USERS come across.

4.6. SILENCESOFT shall use technical information and information on USER activities in order to prevent various service violation and criminal activities on SITE. Service violation means fraud, spamming, fishing, offers of sexual nature, attempts to log into other persons accounts (profiles), as well as other actions prohibited the Legislation.

4.7. Purpose of USER personal data processing is also to obtain statistics on tendencies in the segment of SILENCESOFT activities to be used to improve SITE, as well as to expand range of products and services. The statistics may be collected with the help of analysis perform both by SILENCESOFT and other engaged companies. Such companies shall analyze information confidentially and delete it after completing their task.

4.8. Collected personal data may be stored and processed in centralized database in order to understand user activity with regard to all SITE services.

## **5. PROVISION OF PERSONAL DATA TO THIRD PARTIES**

5.1. The USER's personal data may be provided to third parties - SILENCESOFT contractors for the provision of SILENCESOFT services, as well as to other companies for use for the purposes for which this information was collected, and only for the purposes specified in this POLICY (in particular, providers of communication and other information services, financial institutions, payment companies, marketing partners). Whenever possible, the information will be provided in an anonymous (depersonalized) form, however, in some cases, such information may allow identification.

5.2. Personal data may be passed to third parties, for example, when making payments, sending service messages or when storing information on server of a third party. However, terms and conditions of SILENCESOFT contract with partners and contractors protect USER right for confidentiality and prohibit use of data by the partners and contractors in other purposes.

5.3. if there are grounds to believe that law offence of crime was committed by means of the SITE, personal data of USER and information on the SITE utilization may be passed to competent in investigation bodies upon official request of such bodies and according to the Legislation.

5.4. Personal data may be passed to the respective bodies at SILENCESOFT initiative in order to prevent planned law violations or crimes, if there are solid reasons to believe that illegal actions may be performed with regard to third parties or SITE services.

5.5. SILENCESOFT shall be entitled to provide USER personal data to other state bodies in accordance with Legislation requirements.

5.6. SILENCESOFT shall not use, sell, hand over, or disclose USER personal data in any other way or with any other purpose, which are not specified in this POLICY, if it is not stipulated by court decision, or in case of prior explicit consent for it.

5.7. Of personal data handed over to third parties when SILENCESOFT renders services under contract, such third parties shall be obliged to process the data confidentially, and not use the information in any other purposes.

## **6. USER RIGHTS**

6.1. USER shall be entitled for:

6.1.1. At any time, without giving reasons, withdraw your consent to the processing of personal data.

6.1.2. To receive information regarding the processing of their personal data, containing Request changes to your personal data if the personal data is incomplete, outdated or inaccurate.

6.1.4. Receive information about the provision of your personal data to third parties

6.1.5. Demand a free termination of the processing of their personal data, including their

deletion, in the absence of grounds for the processing of personal data provided for by the Legislation. However, this does not apply if the storage of data is necessary for legitimate commercial or legal purposes.

If it is not technically possible to delete personal data, SILENCESOFT takes measures to prevent further processing of personal data, including their blocking, and notifies the USER of this within the same period.

SILENCESOFT has the right to refuse to satisfy the USER's requirements to terminate the processing of his personal data and (or) delete them if there are grounds for processing personal data provided for by the Legislation, including if they are necessary for the stated purposes of their processing, notifying the USER about this within fifteen days term.

6.1.6. Complain about the actions of SILENCESOFT in accordance with the Legislation.

6.2. USER, in order to exercise the rights provided for by this POLICY and the Legislation, submits an application to SILENCESOFT in writing (a scanned copy of the application) or by e-mail.

6.3 At the same time, if the provision of services or licensing of software, without personal data, the destruction of which is requested by the USER, SILENCESOFT shall be entitled to stop providing such services unilaterally (data necessary for identification, verification, etc.)

6.4. When request to provide, edit, or destroy personal data is received, USER shall be obliged to confirm his/ her identity.

6.5. SILENCESOFT is ready to provide, edit, and destroy personal data, if such USER request is not associated with extreme technical complications, does not compromise confidentiality of other users, and is not received too often.

## **7. PERSONAL DATA STORAGE**

7.1. SILENCESOFT stores the collected personal data of the USER during the entire period of validity of the agreements to which the USER is a party (or representative of the party), and for 5 (five) years after its expiration.

7.2. The USER's personal data will not be stored longer than necessary to fulfill the purposes for which they were collected. When the purposes for which personal data were collected are achieved, or the storage of personal data is not required by law, SILENCESOFT will take measures to destroy, aggregate or anonymize personal data.

## **8. PERSONAL DATA SECURITY**

8.1. SILENCESOFT shall store and process USER personal data by reliable and secure way. SILENCESOFT shall follow procedures, principles and measures, which guarantee USER confidentiality taking into account Legislation requirements.

8.2. SILENCESOFT shall continuously improve ways of collection, storage, and processing of USER personal data.

8.3. SILENCESOFT shall limit access of its employees, contractors, and partners to USER personal data, as well as impose on them strict contractual obligations, violation of which shall entail responsibility according to legislation.

## **9. CHANGE OF PRIVACY POLICY**

9.1. SILENCESOFT undertakes to update regularly POLICY so that to inform USERS on all changes in approach to processing of USERS personal data. If any material changes are adopted, USERS will be informed about them separately. All other changes to POLICY shall be reflected on SITE.

9.2. If any questions with regard to POLICY arise USER may contact User Support Service of SILENCESOFT.

## **10. CONTACTS**

Silencesoft LTD

[info@silencesoft.io](mailto:info@silencesoft.io)

Tbilisi, Georgia