

Eurogold Industries Privacy Policy

This Privacy Policy becomes effective on September 30, 2018.

We, Eurogold Industries Ltd. (hereinafter – “we”, “us”, “Eurogold Industries”), created this Privacy Policy to help you understand what Data we collect, sphere of its application and the way your rights can be exercised. It’s important to read our Privacy Policy and we hope you’ll spare some time to give it a consideration.

Privacy and safety of our Contractors and Visitors is of paramount importance for us. We are committed to protecting Data you share with us. This privacy policy explains how we process Personal Data collected through use of our website and during collaboration with us.

By personal data we mean any information that can be used to identify you as a natural person. As widely understood, personal information includes person’s name, email address, social media posts, physical, physiological or genetic information, medical information, location, bank details, IP address, cookies, cultural identity, etc.

For the purposes of this Policy “Contractor” shall mean a legal entity which concluded agreement with us or intends to conclude it and by “Visitor” we mean an individual who visits [our website](#).

Personal Data may be voluntarily provided by the Contractor and Visitor, or, in case of Usage Data, collected automatically if you use Eurogold Industries website.

Any use of Cookies or other tracking tools by Eurogold Industries or by Data Controllers of third-party services used by Eurogold Industries, is aimed at providing Services required by Visitors and Contractors, in addition to any other purposes described herein and in the Cookie Policy.

Contractors and Visitors are responsible for any third-party Personal Data shared with Eurogold Industries and confirm that they have the third party's consent to provide this Personal Data to us.

We adhere to the following principles in order to protect your privacy:

- principle of purposefulness - we process personal Data fairly and in a transparent manner only for the achievement of determined and lawful objectives, and they shall not be processed in a manner not conforming to the objectives of Data processing;
- principle of minimalism - we collect personal Data only to the extent necessary for the achievement of determined purposes and do not keep personal Data if it is no longer needed;
- principle of restricted use - we use personal Data for other purposes only with the consent of the Data subject or with the permission of a competent authority;

- principle of Data quality - Personal Data shall be up-to-date, complete and necessary for the achievement of the purpose of Data processing;
- principle of security - security measures shall be applied in order to protect personal Data from unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical and organizational measures;
- principle of individual participation - the persons shall be notified of Data collected concerning him or her, the persons shall be granted access to the Data concerning him or her and the persons have the right to demand the correction of inaccurate or misleading Data.

1. Data We Collect

1.1. Website Visitors

- 1.1.1.** We may collect, record and analyze information of our website Visitors.
- 1.1.2.** We collect name and e-mail address only if Visitor wants to contact us and fills our contact form. We use collected Data only to communicate with You. If You do not want us to collect your Data, please do not use our contact form and do not give your consent.
- 1.1.3.** While processing Personal Data of our Visitors, we rely on your consent to process your Personal Data for the purposes of communication with you. When we share such information with our contractors (which may be located outside of the European Economic Area) in order to provide a requested answer or solution promptly and correctly, we also rely on your consent. We use such Data in ways you would reasonably expect and which have a minimal privacy impact. You can withdraw your consents at any time by sending us an email to office@eurogold-industries.com with your withdrawal and your Personal Data will be deleted in 72 hours.
- 1.1.4.** Besides, we record Usage Data. If information is collected automatically through Eurogold Industries website (or third-party services employed by Eurogold Industries), which can include: the IP addresses or domain names of the computers utilized by the Visitors who visit Eurogold Industries website, URI addresses (Uniform Resource Identifier), time of the request, method utilized to submit the request to the server, size of the file received in response, numerical code indicating the status of the server's answer (successful outcome, error, etc.), country of origin, features of the browser and operating system utilized by the Visitor, various time details about visit (e.g., time spent on each page) and details about the path followed with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the Visitors' IT environment.

- 1.1.5. Visitors can control the use of Cookies at individual browser level. If you reject Cookies, you may still use our website, but your ability to use certain features or see certain areas of our website may be limited. To learn more about Cookies Visitors can refer to Cookie Policy.
- 1.1.6. Processing of Usage Data is based on our legitimate interests. It is necessary to manage and run our business efficiently and effectively, provide quality services including website support, developing and improving products, determining who may be interested in them.
- 1.1.7. When you contact us by phone or e-mail, you give us your implicit consent because you reasonably expect us to reply. We collect Data you give us in order to provide information you need. We may record your request and our reply in order to increase the efficiency of the organization of our support service. We keep personal information associated with your message, such as your name, e-mail and mobile telephone number, so as to be able to track our communications with you in order to provide you with high-quality service.
- 1.1.8. We may record telephone conversations to improve quality of our support and train our employees. We always warn you about this at the beginning of every conversation.
- 1.1.9. Wherever possible, we aim to obtain your explicit consent to process your Personal Data, for example, by asking you to agree to use Cookies or receive marketing e-mails.
- 1.1.10. By registering on the mailing list, the Visitor's e-mail address will be added to the contact list of those who can receive e-mail messages containing information of commercial or promotional nature concerning Eurogold Industries. Your e-mail address might also be added to this list after you become a Contractor.

1.2. Contractors

- 1.2.1. We need to process information you give us in order to fulfill our obligations under contract concluded with you or in order to take steps needed prior to entering into a contract.
- 1.2.2. We register names, job titles, e-mail addresses and telephone numbers of employees – representatives of the Contractor. This information is used to identify the Contractors, provide them with services, mails, notifications, support and marketing activities to meet other contractual obligations.
- 1.2.3. We rely on your explicit consent when we send email messages containing information of commercial or promotional nature. You can

withdraw your consent by following the "unsubscribe" link which you will find on all the email marketing messages we send you. Alternatively, you can contact us at office@eurogold-industries.com.

- 1.2.4. After fulfilling contracts, we store relevant information about our Contractors. We rely on our legitimate interests. It is necessary for efficient and effective managing and running of our business, providing quality services including products development and improvement, determining target audience.

2. Compliance with General Data Protection Regulation (GDPR)

- 2.1. For Visitors and Contractors located in the European Economic Area (EEA) privacy rights are granted and all processing of Personal Data is performed in accordance with regulations and rules following [Regulation \(EU\) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such Data, known as the General Data Protection Regulation \(GDPR\)](#).
- 2.2. We process Personal Data as a Controller within GDPR framework:
 - If you enter into an agreement with Eurogold Industries you shall become the Controller of Contractors' Data as outlined above in "Contractor" section.
 - Besides, Eurogold Industries shall act as a Controller of Visitors' Data as outlined above in "Visitor" section.

3. Your rights

- 3.1. Visitors and Contractors can review, correct, update, delete or communicate their personal information. For these purposes, contact us directly at office@eurogold-industries.com. We will process your request within seventy-two (72) hours and handle it promptly as required by law.
- 3.2. Visitors and Contractors whose data is processed have the right to object to our processing of their Data.
- 3.3. Access to their Data. Visitors and Contractors have the right to learn if Data is being processed by Data Controller, obtain information about certain aspects of processing process and obtain copy of the Data processed.
- 3.4. Verify and seek rectification. Visitors and Contractors have the right to verify accuracy of their Data and ask its update or correction.
- 3.5. Restrict processing of their Data. Under certain circumstances Visitors and Contractors have the right to restrict processing of their Data. In this case Data Controller will not process their Data for any purpose other than storing it.

- 3.6. Have their Personal Data deleted or otherwise removed. Under certain circumstances Visitors and Contractors have the right to request Data Controller to erase their Data.
- 3.7. Receive their Data and communicate it to another controller. Visitors and Contractors have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- 3.8. You can withdraw your consents at any time by replying to the email with your withdrawal and your Personal Data will be deleted in 48 hours.
- 3.9. Also, you have the right to lodge a complaint with a supervisory authority if you think that we violate your rights. However, we recommend to contact us first.

4. Data Retention

- 4.1. Personal Data shall be processed and stored for as long as required by the purposes it was collected for.
- 4.2. We will keep your Data for as long as you are our Contractor. If you are no longer a Visitor or Contractor of Eurogold Industries, we will keep your Data for the minimum length of time required to comply with the purposes set out in this policy and relevant legal or regulatory obligations.
Therefore:
 - Personal Data is collected for the purposes related to our contract and shall be retained until such contract has been fully performed. Besides, we store this information for a reasonable time after fulfilling contract, but no more than for 24 months.
 - Personal Data collected and processed with your consent shall be retained as long as we have your consent.
- 4.3. Information obtained via contact forms is deleted on an annual basis. Your information will be deleted if you did not communicate with support team for more than 12 (twelve) months.
- 4.4. Any Usage Data collected for the purposes of analytics will be deleted in no more than 12 months after being collected.
- 4.5. Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to Data portability cannot be enforced after expiration of the retention period.

5. Information Security

- 5.1. We care to ensure the security of personal Data. We follow generally accepted industry standards to protect information submitted to us, both

during transmission and once we receive it. We provide technical, physical, and administrative security measures to assure reasonable protection of your Personal Data. When we or our contractors process Your information, we also make sure that your information is protected from unauthorized access, loss, manipulation, falsification, destruction or unauthorized disclosure. This is done through appropriate administrative, technical and physical measures.

- 5.2. There is no 100% secure method of communicating information over the Internet or electronic storage method. Therefore, we cannot guarantee its absolute security.
- 5.3. We never process any kind of sensitive Data and criminal offence Data. Also we never use automated individual decision-making.

6. Personal Data we share with others

- 6.1. We work with third party service providers which provide website development, hosting, e-mail sending services necessary to provide products or services which you have requested.
- 6.2. We also share your Personal Data with our partner in your country to provide you with our services most effectively.
- 6.3. We use Google Analytics to monitor and analyze web traffic. [Google Analytics](#) is a web analysis service provided by Google LLC. ("Google"). Google utilizes the Data collected to track and examine the use of our website, to prepare reports on its activities and share them with other Google services. Google may use Data collected to contextualize and personalize the ads of its own advertising network. Personal Data collected: Cookies and Usage Data. Place of processing: USA – [Privacy Policy](#) – [Opt Out](#). Privacy Shield participant.
- 6.4. We use [MailChimp®](#) provided by The Rocket Science Group, LLC to send e-mail messages containing information of commercial or promotional nature concerning Eurogold Industries. Personal Data collected: e-mail address and name – [Privacy Policy](#).
- 6.5. We use [Bitrix24](#) provided by Bitrix, Inc to build Visitors and Contractors profiles by starting from an e-mail address, a personal name, or other information that the Visitors and Contractors provide to us. This Personal Data may also be matched with publicly available information about the potential corporate clients (such as social networks' profiles) and used to build profiles that we can display and use for improving our services. Some of these services may also enable the sending of timed messages to Visitors or Contractors, such as e-mails based on specific actions performed on our website. Place of processing: USA – [Privacy Policy](#).

- 6.6. We use [SiteGround](#) provided by SiteGround Spain S.L. as secure hosting facilities. Place of processing: Spain - [Privacy Policy](#). The infrastructure is secured through a defense-in-depth layered approach.
- 6.7. We may need to share your Personal Data with the third parties that provide those services. Where your Personal Data is transferred outside of the European Economic Area ("EEA"), we require that appropriate safeguards are in place. These contractors may have access to, or process Personal Data on behalf of us, as part of providing those services to us. We limit information provided to these service providers to the extent it is reasonably necessary for them to perform their functions.

7. Use of site by children

- 7.1. We do not provide services to children. Visitors declare themselves to be adult according to their applicable legislation.
- 7.2. Our website is not directed to persons under the age of 16. Minors may use our website only with the assistance of a parent or guardian. Under no circumstance persons under the age of 13 may use the website.
- 7.3. We collect Data about all Visitors regardless of age. We do anticipate that some of those Visitors will be children.

8. Application of this Privacy Policy

- 8.1. This Privacy Policy is applicable only to our website. This version of the Privacy Policy is effective from September 30, 2018.
- 8.2. While visiting our website, please be aware, that our website contains links to other websites. Once redirected to another website, this Policy is no longer applicable. We are not responsible for the content or privacy policies of these other sites.

9. Acceptance of these Conditions

- 9.1. We assume that all Visitors and Contractors have carefully read this document and agree to its content. If one does not agree with this privacy policy, they should avoid using our website.

10. Changes and Updates to Our Privacy Policy

- 10.1. We may update this policy from time to time, so please review it frequently. All changes to this Privacy Policy are effective when posted on this page.
- 10.2. In case of significant changes are made to this Privacy Policy, we will use reasonable endeavors to inform you in advance by e-mail or notice on the website. When we change this Policy in a material manner, we will let you

know via email prior to the changes becoming effective and update the effective date at the top of this page.

11. Contact us!

- 11.1. If you have any questions about the practices of this website or your dealings with this website, please contact us at office@eurogold-industries.com.

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