

PRIVACY POLICY

Last updated at November 08, 2022

This Privacy Policy (hereinafter referred to as the “**Policy**”) describes the procedures on processing of personal data of Data subjects using the following websites: evercodelab.com, everchain.eu, evercodecyprus.com (collectively hereinafter – “**Website**”), belonging to Evercode Lab group of companies, (hereinafter referred to as the “**Evercode Lab**”).

THE FOLLOWING TERMS AND DEFINITIONS SHALL APPLY TO THIS POLICY:

“**Controller**” means Evercode Lab.

“**Processor**” means a natural person or a legal entity that is engaged in the processing of Personal data of Data subjects under the contract concluded with Evercode Lab.

“**Data subject**” or “**User**” means a natural person who visits the Website.

“**Evercode Lab**”, “**Ourselves**”, “**We**” and “**Us**” refers to the company LLC “Evercode Lab”.

“**Usage data**” means personal data about the Data subject’s activities on the Internet collected automatically either through the use of the Website, including but not limited to location information and device information. The Usage data is anonymous and cannot be attributed to the particular person.

“**Personal data**” means information that relates to Data subject and identifies Data subject (list is given in Section 4 of the Policy).

“**Data**” means all data collected and processed under this Policy.

“**Cookies**” means small fragments of data sent by our web server and stored on user's device. Cookies are stored when you visit the Website, and this allows us to make it work effectively: Cookies allow us to save your selected settings (e.g., language) and analyze Website traffic. You have the right to refuse Cookies that you do not want to be used in the Cookie-banner on the Website, however, please, note that you cannot disable Cookies necessary for functionality of the Website.

“**Party**” refers to either you or us. For the avoidance of any doubt, the contracting Parties under these Terms are you and Evercode Lab.

Evercode Lab processes Personal data of Data subjects under this Policy in accordance with the following principles:

- (1) The processing of Data is performed only in accordance with this Policy and the applicable legislation;
- (2) The processing of Personal data is performed only for achieving the purposes specified in the Policy;
- (3) Evercode Lab processes only Personal data that is correct and up-to-date and retained only for such time as may be necessary for achieving the purposes of processing provided by the Policy.

1. GENERAL PROVISIONS

- 1.1. Collection and processing of users' Data is essential for our ability to support Website, as well as its functionality.



- 1.2. Under this Policy, Evercode Lab is the Controller.
- 1.3. The Controller processes Data of Data subjects directly by itself or through engaged Processors. The Processors process Data of Data subjects on behalf of the Controller. All the Processors act under the contracts concluded with the Controller under the direct authorization of the Controller. The Controller observes the compliance of the Processors with the applicable personal data legislation.

2. GUARANTEES

- 2.1. We do not and will not process any special categories of personal data such as data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs etc. If Evercode Lab finds out that such personal data has been processed, Evercode Lab will immediately delete such personal data and will take reasonable measures preventing the processing of such personal data in future.
- 2.2. We guarantee that we do not sell users' Data directly for a monetary reward. Evercode Lab will not give, sell, rent or loan any personal Information to any third party.
- 2.3. We do not use automated processing of Personal data to make decisions that entail legal consequences for Data subject, or otherwise affect his/her rights and legitimate interests.

3. PURPOSES OF DATA PROCESSING

- 3.1. Collectively, we rely on the following grounds for Data processing:
 - your explicit informed consent with the Policy to processing, expressed through consent forms
 - our legitimate interest
- 3.2. Evercode Lab has the right to process Data of Data subjects provided in Sections 4,5 of the Policy for the following purposes:
 - Statistical and analytical purposes
 - User support
 - For User's authorisation on the Website
 - For User's authorisation in the social media for activating the possibility to write commentaries in Evercode Lab's blog on the Website
 - Improving the work of the Website
 - Providing the User with all the functionality of the Website
 - Analyzing the interaction of Data subjects with the Website.

4. DATA PROCESSED

- 4.1. Under this Policy, Evercode Lab has the right to process the following categories of Data:
 - Usage data
 - Personal data
 - Cookies (please see Section 5 for more detail)

The following table provides a list of data collected, as well as the reasons and purposes for its collection.



Category	List of Data	Legal basis	Purpose(s)
When you use the Website			
Usage Data	Information about your device, including where available IP address, operating system and browser type; General information about User's location, collected when they use Website	Our legitimate interest in market research, statistics analysis.	Statistics analysis of the use of our Website. Problem solving and service improvement Analyzing the interaction of Data subjects with the Website
When you log on the Website through the form / log on the Website on the Evercode Lab's blog page / or contact our user support			
Personal data	First and last name; Email address; Phone number.	- Consent - Our legitimate interest in market research, statistics analysis.	- User support - For User's authorisation on the Website - For User's authorisation in the social media for activating the possibility to write commentaries in Evercode Lab's blog on the Website Improving the work of the Website - Providing the User with all the functionality of the Website

5. COOKIES AND SIMILAR TECHNOLOGIES

5.1. Evercode Lab use cookies to help Data subjects navigate through the Website and efficiently perform the functions of the Website. Particularly, the following kinds of cookies may be used by Evercode Lab in accordance with this Policy:

- Necessary cookies of the following providers: yandex.ru, google.com;
- Statistics cookies of the following providers: evercodelab.com, twitter.com, yandex.ru;
- Marketing cookies of the following providers: evercodelab.com, t.co, twitter.com, yandex.ru.

6. TRANSFER OF DATA TO THIRD PARTIES

6.1. We may transfer your data to third parties indicated in this Policy within the designated purposes. By agreeing to the Policy, you confirm your consent to such transfer. Our partners are engaged in storage and analytics. Together we hope to provide you with the best user experience.

6.2. We allow our partners' services to collect the following categories of data:

- Usage data;
- Personal data;



- Cookies.

6.3. This allows us to:

- Arrange statistical analysis;
- Arrange User's authorisation in the social media for activating the possibility to write commentaries in Evercode Lab's blog on the Website;
- Analyze the interaction of Data subjects with the Website.

6.4. We guarantee that the agreements we conclude with the third parties - our partners provide for a level of personal data protection not lower than the Policy does and comply with the requirements of applicable data protection legislation.

6.5. Third-party services that we use introduce technical and organizational measures to ensure secure processing of personal data, as specified in their privacy policies.

7. RIGHTS OF DATA SUBJECT

7.1. Each Data subject has the following rights:

7.1.1. Right of access: the Data subject is entitled to receive from Evercode Lab the information about Personal data that is processed by Evercode Lab, the purposes of personal data processing, the categories of personal data recipients, the period of personal data storage, and the information about the transfer of personal data to other jurisdictions.

7.1.2. Right to lodge a complaint with a supervisory authority: the Data subject is entitled to file a complaint against Evercode Lab with a supervising authority of Data subject's habitual residence or place of work, or with a supervising authority located in a place of possible infringement, or with a supervising authority of Evercode Lab's residence which supervises the compliance of Evercode Lab with personal data legislation.

7.1.3. Right to rectification: the Data subject is entitled to rectification of inaccurate data about the Data subject.

7.1.4. Right to erasure: the Data subject is entitled to erasure the Personal data about the Data subject.

7.1.5. Right to data portability: the Data subject is entitled to receive Personal data about the Data subject in a structured, commonly used, and machine-readable format and transmit such data to another controller.

7.1.6. Right to object: the Data subject is entitled to object to personal data processing on the grounds relating to a particular situation (for example, if Evercode Lab processes Personal data for marketing purposes).

7.1.7. Right to withdraw Data subject's consent to personal data processing.

7.2. If the Data subject is intending to use one of the rights provided for in para.9.1 of the Policy, the Data subject shall send a mail or an email to Evercode Lab by using contact details of Evercode Lab provided in the Policy.

8. SECURITY AND PROTECTION OF PERSONAL DATA

8.1. Evercode Lab takes all the reasonable measures to protect Data subject's Personal data from unauthorized access by third parties, as well as against loss, misuse, alteration, or destruction of personal data, including the following:

8.1.1. Only authorized personnel of Evercode Lab have access to the Personal data of Data subjects, and these employees and contractors are required to treat this information as confidential.



- 8.1.2. We will not permit any third parties to contact you directly on an unsolicited basis in relation to their own products or services. We do not sell, trade, or rent your Personal data to others.
- 8.1.3. We use certain security measures to help keep your Personal data safe, but we cannot guarantee that these measures will stop any users trying to get around the privacy or security settings on the Website through unforeseen and/or illegal activity.
- 8.1.4. We are constantly improving our data security systems and doing everything in our capacity to prevent its leakage. In case such a leak occurs, we undertake to notify users and the regulatory authority about the incident as quickly as possible, as well as to make every effort to minimize negative consequences.

9. STORAGE OF PERSONAL DATA

- 9.1. We strive to limit the period of Personal data processing to the necessary minimum and not to store them for longer than is reasonably necessary.
- 9.2. In accordance with the applicable law, we process your Personal data only while you use our Website, as well as for 3 years from the date of the last session and activity. If applicable data protection legislation prescribes storage of Personal data for a longer or shorter period of time, we will store Personal data for a period in accordance with these legal requirements.

10. CHANGES TO THE PRIVACY POLICY

- 10.1. The Policy available is presented in the most up-to-date version. Over time, we may unilaterally amend the Policy, including to comply with the latest changes in the applicable law and jurisprudence. All changes come into force from the moment they are published on this page, unless a different period is indicated in the text of the amendments.
- 10.2. Evercode Lab will make every effort to organize additional ways to notify users of amendments to the Policy, but we ask you to regularly check for the latest version yourself.

11. CONTACTING EVERCODE LAB

Email: hello@evercodelab.com