

Privacy Policy

EddySoftGlobal OU, registration number: 14082438, VAT: EE102769414, legal address: Harju maakond, Tallinn, Lasnamäe linnaosa, Pae tn 25-47, 11414 Estonia (hereinafter referred to as the "Company"), prioritizes information security in the course of its operations.

The Company implements a comprehensive set of legal, organizational, and technical measures aimed at protecting information about clients, counterparties, and other personal data subjects.

This Personal Data Processing Policy (hereinafter referred to as the "Policy") outlines the key provisions regarding the processing of personal data (hereinafter referred to as "PD") implemented by the Company during PD processing.

1. General Provisions

1.1. The legal basis for processing personal data is a set of legal acts, pursuant to and in accordance with which the Company carries out the processing of personal data.

1.2. This Policy applies to any action (operation) or set of actions (operations) performed with personal data, whether using automated means or not, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (dissemination, provision, access), blocking, deletion, and destruction of personal data.

1.3. The following key terms and concepts are used in this Policy:

- **Automated processing of personal data** — processing of personal data using computing technology;
- **Personal data security** — a state of PD protection characterized by the ability of technical means and information technologies to ensure confidentiality, integrity, and availability of PD during processing in personal data information systems;
- **Biometric personal data** — information characterizing a person's physiological and biological features, based on which their identity can be established;
- **Blocking of personal data** — temporary suspension of personal data processing (except in cases where processing is necessary to clarify personal data);
- **Information** — data (messages, information) regardless of the form of its presentation;
- **Personal data information system** — a set of personal data contained in databases and the information technologies and technical means ensuring their processing;
- **PD medium** — a tangible object, including a physical field, in which information is reflected in the form of symbols, images, signals, technical solutions, processes, or quantitative characteristics of physical quantities. Examples of PD media include machine-readable

information carriers (e.g., magnetic and electronic) used for recording and storing information, as well as paper-based carriers;

- **Processing of personal data** — any action (operation) or set of actions (operations) performed with personal data, whether using automated means or not, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (dissemination, provision, access), blocking, deletion, destruction, and anonymization of personal data;
- **Operator** — a legal entity that independently or jointly with other entities organizes and/or carries out the processing of personal data, determines the purposes of processing, the composition of personal data to be processed, and the actions (operations) performed with personal data. Within the framework of this Policy, the Operator is DaoDesk;
- **Personal data (PD)** — any information relating to an identified or identifiable natural person (personal data subject, PDS);
- **Provision of personal data** — actions aimed at disclosing personal data to a specific person or a specific group of persons;
- **Dissemination of personal data** — actions aimed at disclosing personal data to an indefinite group of persons (transfer of personal data) or making personal data available to an unlimited number of persons, including publication in mass media, posting on information and telecommunication networks, or providing access to personal data in any other way;
- **Cross-border transfer of personal data** — transfer of personal data to the territory of a foreign state, a foreign government authority, a foreign individual, or a foreign legal entity;
- **Destruction of personal data** — actions resulting in the impossibility of restoring the content of personal data in a personal data information system and/or the destruction of physical PD media;
- **Cookie** — small data files (usually containing letters and numbers) that websites may leave on a computer or mobile device when visiting a site or page. Cookies help the website recognize the device on subsequent visits. This function may also be performed by web beacons or other similar files. In this Policy, the term "cookie" applies to any files that collect information in this manner.

1.4. This Privacy Policy may be amended and/or supplemented by the Company unilaterally at any time without prior notice to Users. Such changes take effect and become binding from the date of their posting (publication) on the Company's official website.

1.5. The processing of personal data is carried out with confidentiality in mind. The Company does not disclose personal data to third parties or disseminate it without the consent of the personal data subject.

2. Purposes and Methods of Personal Data Processing

2.1. The purpose of processing personal data of PD subjects is to ensure the performance of work and provision of services as defined by the Company's Charter, communication with the Company, provision of reference information, promotion of the Company's work and services through direct contacts with users, fulfillment of the Company's contractual obligations to clients, enabling employees and counterparties of the Company to perform duties stipulated in contracts between the Company and clients, as well as other purposes outlined in the User Agreement or other agreements signed or accepted by the personal data subject. This includes responding to inquiries received from visitors to the website <https://daodesk.ai> and fulfilling the requirements of applicable laws.

Processing (collection, systematization, accumulation, storage, clarification (updating, modification), use, dissemination (including transfer), anonymization, blocking, and destruction) of personal data is divided into:

- Processing of personal data in personal data information systems using automated means;
- Processing of personal data without the use of automated means;
- Mixed processing of personal data.

2.2. Categories and types of processed personal data.

The processed personal data includes:

- **Individuals, Website Visitors:** Personal data that is not special or biometric: contact phone numbers; email addresses; place of work and position held; user data (location information; OS type and version; browser type and version; device type and screen resolution; source of the user's visit to the site; referral site or advertisement; OS and browser language; pages visited and buttons clicked by the user; IP address and other data related to the use of the Company's official website).
- **DaoDesk Service Users on behalf of a legal entity client:** Personal data that is not special or biometric: contact phone numbers; email addresses; place of work and position held; user data (location information; OS type and version; browser type and version; device type and screen resolution; source of the user's visit to the site; referral site or advertisement; OS and browser language; pages visited and buttons clicked by the user; IP address and other data related to the use of the Company's official website).

- **Mobile Application Users on behalf of a legal entity client:** Personal data that is not special or biometric: contact phone numbers; email addresses; place of work and position held; user data (location information; OS type and version; browser type and version; device type and screen resolution; source of the user's visit to the site; referral site or advertisement; OS and browser language; pages visited and buttons clicked by the user; IP address and other data related to the use of the Company's official website).
- **Individual Client (service user, mobile application user, signatory):** Personal data that is not special or biometric: full name; gender; citizenship; date of birth; place of birth; identity document details; contact phone numbers; tax identification number (if applicable); residential address (per passport or other identity document); email address; place of work and position held; user data (location information; OS type and version; browser type and version; device type and screen resolution; source of the user's visit to the site; referral site or advertisement; OS and browser language; pages visited and buttons clicked by the user; IP address and other data related to the use of the Company's official website).
- **Individual Entrepreneur Client (service user, mobile application user, signatory):** Personal data that is not special or biometric: full name; gender; citizenship; tax identification number; contact phone numbers; email address; registration certificate number as an individual entrepreneur; user data (location information; OS type and version; browser type and version; device type and screen resolution; source of the user's visit to the site; referral site or advertisement; OS and browser language; pages visited and buttons clicked by the user; IP address and other data related to the use of the Company's official website).
- **Self-Employed Counterparty:** Personal data that is not special or biometric: full name; gender; citizenship; date of birth; place of birth; identity document details; contact phone numbers; tax identification number; residential address (per passport or other identity document); email address.
- **Individual Entrepreneur Counterparty:** Personal data that is not special or biometric: full name; gender; citizenship; tax identification number; contact phone numbers; email address; registration certificate number as an individual entrepreneur.

The Company reserves the right to request additional personal or other data from the User.

2.3. To improve service quality and resolve disputes, telephone conversations between the User and Company employees are recorded and may be reviewed.

2.4. By calling us or receiving a call from the Company, the User consents to the recording and potential review of the telephone conversation.

3. List of Actions with Personal Data

3.1. The Company may process personal data using automated means or without such means through collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (provision, access, dissemination), blocking, deletion, and destruction.

3.2. The Company may transfer personal data to third parties or entrust the processing of personal data to third parties if necessary to achieve the purposes of processing in accordance with this Policy.

3.3. The Company will process personal data only for as long as required to achieve the purposes of processing.

4. Principles and Conditions of Personal Data Processing

4.1. The processing of personal data in the Company is based on the following principles:

- Lawfulness and fairness;
- Limitation of personal data processing to achieving specific, predetermined, and legitimate purposes;
- Prevention of processing personal data incompatible with the purposes of its collection;
- Prevention of combining databases containing personal data processed for incompatible purposes;
- Processing only personal data that meets the purposes of its processing;
- Ensuring that the content and scope of processed personal data correspond to the stated processing purposes;
- Prevention of processing excessive personal data relative to the stated purposes;
- Ensuring the accuracy, sufficiency, and relevance of personal data in relation to the processing purposes;
- Destruction of personal data upon achieving the processing purposes or when the need to achieve these purposes is lost, unless the Operator can rectify violations, and unless otherwise provided by law.

4.2. The Company does not disclose personal data to third parties or disseminate it without the consent of the personal data subject, unless otherwise required by law.

4.3. The processing of special categories of personal data by the Company, such as those concerning race, nationality, political opinions, religious or philosophical beliefs, health, or intimate life, is permitted in the following cases:

- The personal data subject has provided written consent to the processing of their personal data;
- The personal data subject has provided written consent to the processing of their personal data for dissemination;
- Processing is carried out in accordance with legislation on state social assistance or labor laws;
- Processing is necessary to protect the life, health, or other vital interests of the personal data subject or others, and obtaining consent is impossible;
- Processing is necessary to establish or exercise the rights of the personal data subject or third parties, or in connection with the administration of justice.

4.4. The Company must ensure that the foreign state to which personal data is to be transferred provides adequate protection of the rights of personal data subjects prior to initiating such a transfer.

5. Rights of the Personal Data Subject

5.1. The personal data subject decides to provide their personal data and consents to its processing freely, of their own will, and in their own interest. Consent to the processing of personal data may be given by the personal data subject or their representative in any form that allows confirmation of receipt, unless otherwise stipulated by law.

5.2. The personal data subject has the right to obtain information from the Company regarding the processing of their personal data, unless such right is restricted by law. The personal data subject may demand clarification, blocking, or destruction of their personal data if it is incomplete, outdated, inaccurate, unlawfully obtained, or unnecessary for the stated purpose of processing, and take legal measures to protect their rights.

5.3. The Company's processing of personal data for the purpose of promoting goods, works, or services through direct contact with potential consumers via communication means is permitted only with the prior consent of the personal data subject. The Company must immediately cease processing the personal data subject's data for these purposes upon their request.

5.4. Decisions that produce legal consequences for the personal data subject or otherwise affect their rights and legitimate interests may be based solely on automated processing of their personal

data only with their written consent or in cases provided by law that also establish measures to ensure compliance with the rights and legitimate interests of the personal data subject.

6. Obligations of the Company During Personal Data Collection

6.1. If the provision of personal data is mandatory under law, the Operator must explain to the personal data subject the legal consequences of refusing to provide their personal data.

6.2. The Operator is exempt from the obligation to provide the personal data subject with the information specified in clause 8.3 of this Policy in the following cases:

- The personal data subject has been notified of the processing of their personal data by the respective Operator;
- The personal data was obtained by the Operator based on law or in connection with the performance of a contract in which the personal data subject is a party, beneficiary, or guarantor;
- The personal data has been made publicly available by the personal data subject or obtained from a publicly available source;
- The Operator processes personal data for statistical or other research purposes, journalistic activities, or scientific, literary, or other creative activities, provided the rights and legitimate interests of the personal data subject are not violated;
- Providing the personal data subject with the information specified in clause 8.3 of this Policy would violate the rights and legitimate interests of third parties.

7. Consent to Personal Data Processing and Applicable Disclaimers

7.1. The Website User freely, of their own will, and in their own interest provides their personal data to the Company.

7.2. By accepting the terms of this Policy, the Website User confirms that the personal data they provide is accurate. The Company assumes that the Website User provides accurate personal data and keeps it up to date.

7.3. By filling out the data fields provided on the Website, the Website User accepts this Policy and consents to the processing of their personal data in the manner and under the conditions specified in this Policy.

7.4. By accepting the terms of this Policy, the Website User confirms awareness of their rights and obligations, including the right to access their personal data and to withdraw consent.

7.5. The processing of personal data ceases upon achieving the purposes of processing, expiration of the consent period, withdrawal of consent by the personal data subject, or detection of unlawful processing. The personal data subject may withdraw consent by sending a written notification to the email address listed on the Website under the "Support and Technical Issues" section.

7.6. If the Website User does not intend to provide personal data or does not accept this Policy, they must stop using the Website, in which case the Company cannot ensure the User's ability to use the Website.

8. Other Data That May Be Processed

8.1. The Company may collect information about Website visits by users without the users providing such information themselves. This information may be obtained using various methods, tools, and internet statistics and configuration tools. The Company may use these methods and tools to promote its work and services, provide information about upcoming events through targeted advertising, and enhance Website usability by creating profiles for registered users. These methods and tools are not used to identify unregistered users.

8.2. If the Website User does not agree to cookies being stored on their device, they may independently disable this option in their browser settings. Stored cookies can also be deleted at any time via the browser's system settings. The Website User may adjust browser settings to accept or reject all cookies by default or cookies from specific websites, including the Website.

8.3. Disabling certain cookies may result in the inability to use specific sections or functions of the Website.

8.4. If the Website User does not agree with the use of internet statistics and configuration methods, tools, and instruments, they must stop using the Website, in which case the Company cannot ensure the User's ability to use the Website.

9. Ensuring Personal Data Security

9.1. The security of personal data processed by the Company is ensured through the implementation of legal, organizational, and technical measures necessary to comply with legal requirements in the field of personal data protection.

9.2. To prevent unauthorized access to personal data, the Company employs the following organizational and technical measures:

- Appointing officials responsible for organizing the processing and protection of personal data;

- Limiting the number of employees who process personal data and have access to it in the course of their duties, and regulating the access procedure;
- Familiarizing employees with legal requirements and the Company's internal regulations on personal data processing and protection;
- Identifying threats to personal data security during processing;
- Developing a personal data protection system;
- Verifying the readiness and effectiveness of information protection tools;
- Password-protecting user access to the personal data information system;
- Recording and tracking user actions in personal data information systems;
- Restricting user access to information resources and software/hardware processing tools;
- Implementing access control tools for communication ports, input/output devices, removable media, and external storage devices;
- Using antivirus tools and personal data protection system recovery tools;
- Applying cryptographic protection tools, where necessary, to ensure personal data security during transmission over open communication channels;
- Implementing network firewalls;
- Detecting intrusions into the Company's corporate network that violate or create preconditions for violating established personal data security requirements;
- Analyzing the security of the Company's personal data information systems using specialized software (security scanners);
- Centralized management of the personal data protection system;
- Backing up information;
- Training employees using information protection tools in personal data information systems on their proper use.

10. Conditions for Terminating Personal Data Processing

10.1. Personal data shall be destroyed upon achieving the processing purposes or when the need to achieve these purposes is lost, unless otherwise provided by law, or in the event of unlawful actions with personal data and the inability to rectify violations within the legally established timeframe.

11. Ensuring Confidentiality

11.1. Personal data of visitors to the website <https://daodesk.ai>, DaoDesk service users, and other personal data subjects of the Company are stored in personal data information systems.

12. Access to Personal Data

Access to their personal data is provided to the personal data subject (or their legal representative) upon request. The request must include the number of the primary identity document of the personal data subject or their legal representative, details of the document's issuance date and issuing authority, and the handwritten signature of the personal data subject or their legal representative.

13. Conditions and Scope of Data Disclosure to Partners and Third Parties

The Company ensures the confidentiality of personal data and is obliged not to transfer it to third parties without the consent of personal data subjects, unless otherwise required by law. The transfer of personal data to third parties is carried out by the Company based on a relevant agreement, a key condition of which is the third party's obligation to ensure the confidentiality of personal data.

14. Updating, Correction, Deletion, and Destruction of Personal Data

14.1. In the event that inaccuracies in personal data or unlawful processing are confirmed, the personal data must be updated by the Company, and processing must cease.

14.2. Upon achieving the purposes of personal data processing or upon withdrawal of consent by the personal data subject, personal data shall be destroyed unless otherwise provided by a contract in which the personal data subject is a party, beneficiary, or guarantor.

14.3. The destruction of personal data after the processing period ends on electronic media is carried out by mechanically damaging the integrity of the medium, preventing the reading or restoration of personal data, or by deleting it from electronic media using methods and tools ensuring the guaranteed removal of residual information.

14.4. The destruction of personal data after the processing period ends on paper media is carried out in accordance with the Company's rules established for document management and archiving. The Company's structural unit responsible for document management and archiving systematically monitors and identifies documents containing personal data with expired retention periods that are subject to destruction.

14.5. The Company is obliged to provide the personal data subject or their representative with information about the processing of their personal data upon request.

15. Use of Cookies

15.1. The website <https://daodesk.ai> uses technologies such as cookies and web beacons to enhance the experience of personal data subjects and improve website efficiency. When a personal data subject visits <https://daodesk.ai>, cookies are stored by the browser on the subject's hard drive, and the Operator receives information sent by the browser and the subject's computer to the Operator's website. The Company uses this information solely for statistical purposes and to improve the website <https://daodesk.ai> in accordance with visitor requirements.

Information obtained in this manner is not transferred or disclosed to third parties. Cookies do not contain information that allows visitor identification and are automatically deleted a few weeks after the site visit. Cookies can be removed from the visitor's browser at their discretion.

Visitors can view most of the website <https://daodesk.ai> without accepting cookies; however, some site functions may be lost if cookies are disabled on the personal data subject's computer. For other webpages on <https://daodesk.ai>, particularly those requiring a username (login) and password, cookies are necessary, and these pages cannot be used if cookies are disabled in the browser.

The Company may also use link tracking or similar technologies to monitor email links clicked by the personal data subject. The Company may correlate this information with the subject's personal data to provide more tailored messages or information about purchases or services. Each email includes an unsubscribe link, allowing the cessation of such message deliveries.

15.2. Cookies used on the website <https://daodesk.ai> are categorized as follows. The Company uses the following categories on its website and other online services:

- **Necessary Cookies:** These cookies are essential for viewing the website <https://daodesk.ai> and using its features. Without them, services such as online payments cannot function.
- **Performance Cookies:** These cookies collect information about website usage, such as the most frequently visited pages. This data may be used to optimize the website and simplify navigation. These cookies are also used by the Company's affiliates to determine transitions to <https://daodesk.ai> from affiliate sites, track the use of Company services, or purchases resulting from website visits, including specific products and services purchased. All information collected is for statistical purposes and remains anonymous.
- **Functional Cookies:** These cookies enable the website to remember choices made by the personal data subject while browsing. For example, a cookie may remember the subject's location, allowing the website to display content in the language of their country. These cookies can also store settings such as text size, font, and other customizable site parameters. They may also track recommended products to avoid repetition. The information provided by these cookies does not allow identification of the subject and is not intended to track their activity on websites unrelated to the Company.

15.3. If the personal data subject prefers not to receive cookies while browsing <https://daodesk.ai> or via HTML emails, they can configure their browser to warn them before accepting cookies or block cookies when the browser alerts their presence. The subject may also disable all cookies in their browser.

16. Access to the Policy

The current version of this Policy is publicly available on the Operator's website at: https://daodesk.ai/privacy_policy.pdf.

17. Procedure for Approving and Amending the Policy

17.1. The Policy is approved and enacted by an order of the Company's management and remains in effect until its cancellation.

17.2. The Operator reserves the right to amend the Policy. Amendments are approved by an order of the Operator's management.

17.3. The Policy is reviewed as necessary, but at least once every three years from the date of the previous review.

17.4. The Policy may be reviewed earlier than the timeframe specified in clause 17.3 due to changes in:

- The Operator's internal regulations governing the organization of personal data processing and security;
- Contracts and agreements regulating the Operator's relationships with counterparties and other parties;
- The Operator's procedures for organizing personal data processing and security.

18. Google API

DaoDesk has developed functionality allowing users to connect their Gmail account to our product via OAuth. Connecting a Gmail account to a DaoDesk account enables DaoDesk to link your account with your personal information in Google, view your personal information (including any information you have made available), access your email address, and retrieve your emails to create them as requests in our product. This connection also allows you to respond to emails directly from our product and delete them after they are received in our product.

Google Workspace APIs are not used for developing, improving, or training generalized artificial intelligence and/or machine learning models.

DaoDesk's use of information obtained from Google APIs will comply with the Google API Services User Data Policy Appendix, including the Limited Use requirement.

19. Final Provisions

19.1. Other rights and obligations of the Company related to personal data processing are determined by applicable personal data legislation.

19.2. Company officials found guilty of violating regulations governing the processing and protection of personal data bear liability as stipulated by the Company's internal regulations.