

## Privacy Policy

### 1. GENERAL PROVISIONS

1.1. This Privacy Policy (hereinafter referred to as the Policy) governs the principles and procedure of processing of personal data, as well as the conditions of the operation of the website [www.happydrive.cc](http://www.happydrive.cc) (hereinafter referred to as the Website or Administration).

1.2. The Data Subject in this Policy is any natural person whose personal data is processed by the Administration.

1.3. This information is provided only for [www.happydrive.cc](http://www.happydrive.cc) website browsing and does not apply to other websites accessed by users through link.

1.4. By visiting the website [www.happydrive.cc](http://www.happydrive.cc), all the following terms and conditions are deemed to be accepted. If the user does not accept these terms, he/she is requested not to access or use the content and services offered through this website.

1.5. Administration reserves the right to modify, add or remove parts of this privacy policy by informing the interested parties through the publication of changes on its website. Each user is required to check this page periodically to ascertain any changes since the last access to the website. In any case, the use of the website indicates the acceptance of any changes made to this policy.

1.6. By giving his/her consent to processing of personal data in accordance with the following provisions, the user permits Website to collect, process and use his/her personal data in compliance with the laws on data protection and the following provisions.

### 2. COLLECTION, PROCESSING AND STORAGE OF PERSONAL DATA

2.1. By submitting his/her personal data, the Data Subject agrees and does not oppose to the management and processing of the personal data by the Administration for the purposes, by the means and following the procedures provided for in this Policy.

2.2. By submitting his/her personal data, the Data Subject grants the Administration the right to collect, compile, organise, use and process for the purpose provided for in this Policy all personal data that the Data Subject provides directly or indirectly through the Website and using its services.

2.4. The Data Subject shall be responsible for ensuring that the data provided by him/her is accurate, correct and complete. Entering of knowingly incorrect data is considered a violation of the Policy. If the submitted data changes, the Data Subject must immediately correct them, and in the absence of the possibility to do so, inform the Administration accordingly. Under no circumstances will the Administration be liable for damages caused to the Data Subject and/or third parties due to the fact that the Data Subject has provided incorrect and/or incomplete personal data or did not apply regarding the

supplement and/or modification of the data upon their change.

### 3. PURPOSES

#### Purposes

3.1. We process personal data for the following purposes:

3.1.1 to allow us to run, maintain and develop our business,

3.1.2 to allow us to offer and provide our Services,

3.1.3 to allow us to conduct information and promotional campaigns (including direct marketing) related to our Services (including by phone, mail and email), keeping Users informed about our Services and special offers that are likely to interest them,

3.1.4 to allow customer service management, e.g. when Users contact our service desk,

3.1.5 to allow contract management, e.g. to address our invoices to our customers,

3.1.6 to enhance our Services and the use thereof,

3.1.7 to perform research and analysis relating to our Services,

3.1.8 to perform tracking of the use of our Services,

3.1.9 to conduct market surveys and/or

3.1.10 to detect fraud, e.g. breaches of intellectual property rights.

3.2. Should the personal data of the User be provided to us via our prospect, customer, supplier or partner, we shall assume that our prospect, customer, supplier or partner has informed the User of this Privacy Notice.

### 4. PROCEDURE AND TERMS OF STORAGE OF PERSONAL DATA

4.1. While processing and storing the personal data of Data Subjects, the Administration implements organisational and technical measures aimed to ensure the protection of personal data against accidental or unlawful destruction, alteration, disclosure, as well as any other unlawful processing.

4.2. Administration applies the following terms for the storage of personal data:

a) Purpose of personal data processing Term of storage

b) Response to inquiries of Data

c) Subjects

d) As long as the data is needed to assess the prospects of the provision of services, and after considering the prospects and after the conclusion of a service contract - 5 (five) years from the date from the termination or expiry on other grounds of the agreement of legal services or representation concluded with the Data Subject.

4.3. Exceptions from the above-mentioned storage terms may be determined to the extent that such deviations do not violate the rights of the Data Subjects, comply with legal requirements, are adequately documented and to the extent justified by the legitimate interests of the Administration or third party.

4.4. The data necessary for the filing, enforcement or defence of legal claims shall be protected insofar as they are necessary to achieve such purposes with the use of a

judicial, administrative or extrajudicial procedure.

## 5. DESTRUCTION OF DATA

5.1. Personal data shall be stored to the extent required by the terms and purposes of the processing of data. Where personal data is no longer required for the purpose of processing and/or when the time limit for the processing of personal data provided for in the Policy expires, the personal data must be destroyed unconditionally.

5.2. Destruction is defined as a physical or technical act by which personal data contained in a document is made unrecoverable by conventional commercially available means.

5.3. Personal data stored in an electronic form shall be destroyed by deleting it without the ability to restore it.

5.4. Paper documents containing personal data shall be shredded, and the paper waste shall be discarded safely.

## 6. RIGHTS OF DATA SUBJECTS

6.1. Data subjects have the right at any time, upon filing a request to the Administration, to familiarise with their personal data processed by the Administration and to find out how they are processed, to request to correct incorrect, incomplete, inaccurate personal data, to demand to suspend, except for storage, the processing of personal data when the data is processed in breach of this Policy.

6.2. To the extent that the processing of personal data is based on the consent, the Data Subject has the right at any time to withdraw the consent without affecting the lawfulness of the processing of the data that had been processed on the grounds of the consent before the withdrawal of the consent.

6.3. Data subjects have the right to obtain the cancellation, anonymization or blocking the data unlawfully processed, including data which do not need to be kept for the purposes for which they were collected or subsequently processed.

6.4. In conclusion, Data subjects have the right to object, in whole or in part: (i) for genuine reasons to the processing of personal data, if pertinent to collection purposes (ii) to the processing of personal data for purposes of sending promotional materials or direct selling or for carrying out market research or commercial communication.

## 7. TECHNICAL AND ORGANIZATIONAL DATA PROTECTION MEASURES

7.1. The organisational and technical personal data protection measures implemented by the Administration shall provide such level of protection that is consistent with the nature of the

personal data managed by the Administration and the risks associated with the processing of such personal data.

7.2. The Administration's employees shall observe the principle of confidentiality and shall keep confidential any personal data that they have familiarised with in the course of their duties unless such information is public in accordance with the provisions of applicable laws or regulations.

7.3. Access to the copies of personal data recorded in a computer system in digital formats shall be password protected.

7.4. Access to personal data and the right to perform personal data processing operations shall be granted only to those responsible employees who need access to personal data in accordance with their duties and work functions.

7.5. In order to protect the automated processing of personal data, the following technical data protection measures shall be used:

- (a) The responsible employees shall use unique passwords for access to personal data, which will be changed and protected to ensure their confidentiality;
- (b) Protection of the processed personal data against unauthorised access to the electronic computer network by means of electronic communication shall be ensured;
- (c) The use of secure protocols and passwords when personal data is transmitted through external personal data networks shall be ensured;
- (d) The protection of computer hardware against malicious software (installation, updating of antivirus software, etc.) shall be ensured.

7.6. The Administration seeks to implement the appropriate technical and organisational measures to ensure standardised processing of the personal data necessary for each specific purpose only. This obligation applies to the amount of personal data collected, the scope of their processing, the storage period and the availability. In particular, such measures shall ensure that no unlimited numbers of natural persons can access personal data in a standardised way, without the intervention of a natural person.

7.7. The Administration shall take the necessary precautionary measures to protect the integrity of the personal data of Data Subjects and to prevent such personal data from being damaged or lost, including the provision of the necessary retrieval of personal data.