

Privacy Policy

VIRTUAL SIM LTD

Registration No. SC743694

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Amendments to this Policy will be posted to http://commu.ninja/assets/legal/commu_ninja_privacy_policy.pdf and will be effective when posted. If we'll make any material changes to this Policy, we will notify the data subjects by email (sent to the e-mail address specified in the account) or by means of a notice on the website prior to the change becoming effective. Any data subject can choose to discontinue use of our products and services if the data subject does not accept the terms of this Policy, or any modified version of this Policy.

We do not knowingly collect any personal information from children under the age of 18. Our products and services are not offered to individuals under the age of 18.

Refusal to provide the data may result in unavailability of provision of our products and services or poor user experience.

Each data subject has the right to lodge a complaint to supervisory authority in case of personal data breach, misuse or any violation of applicable law related to personal data processing.

Categories of Personal Data and Purposes of Processing

Contact details of our customers for the following purposes:

- to enter a contract with a customer;
- to perform a contract with customers;
- to comply with legal obligations on providing the data to government bodies;
- to provide technical support as part of our contract performance;
- to conduct marketing communications on our offerings as our legitimate interest;
- to contact our customers for service evaluation purposes by phone calls or other available means as our legitimate interest.

Any marketing communication is subject to the right to objection. The rights to objection may also apply to other kinds of processing activities.

Technical specifications of customer's device for the following purposes:

- to enter a contract with a customer;
- to perform a contract with customers;
- to comply with legal obligations on providing the data to government bodies;
- to provide technical support as part of our contract performance;
- to conduct marketing communications on our offerings as our legitimate interest;
- to support availability of our products and services;
- to improve customer experience.

Device identification and location data for the following purposes:

- to perform a contract with customers;
- to comply with legal obligations on providing the data to government bodies;
- to provide technical support as part of our contract performance;
- to support availability of our products and services as part of our contract performance.

Information on credit cards and other payment details for the following purposes:

- to perform a contract with customers;
- to provide technical support and fraud detection as part of our contract performance.
- to conduct anti-fraud activities as our legitimate interest.

Cookie data for the following purposes:

- to conduct marketing communications on our offerings as our legitimate interest;
- to deliver targeting ads by our advertisers on the basis of data subject's consent;
- to collect statistical information based on data subject's consent;
- to support availability of our products and services as part of our contract performance;
- to improve customer experience as part of our legitimate interest.

Data on the customers' communications with our products and services for the following purposes:

- to perform a contract with customers;
- to comply with legal obligations on providing the data to government bodies

Passport data and personal photo for the following purposes:

- to identify the customer in order to enter a contract with a customer;
- to comply with legal obligations on providing the data to government bodies;
- to conduct marketing communications on our offerings as our legitimate interest.

Profiling

We maintain profiles of our customers as it's required to provide our customers with history of use of our products and services. The profile includes current balance and billing history. No automated decision making is conducted on the basis of profile except for the cases when our products and services may be provided in different manner on the basis of the customer's balance. Insufficient balance may result in suspension of availability of our products and services.

Recipients of Personal Data

We may share personal information with the following recipients:

- our employees;
- hosting providers;
- technical support providers;
- partners which act as our contractors for provision of our products and services;
- government bodies.

We may transfer the data outside of EU and EEA provided that the transfer is subject to model contract clauses on international transfers of personal data. Providing information to our data processors is subject to signing a data processing agreement

that sets out the subject-matter and duration of the processing, the nature and purpose of the processing, the type of personal data and categories of data subjects and the obligations and rights of the controller.

Period of Storage

The data will be stored during the period when our products and services are provided to the customer and as long as we have a legal obligation to store the data in order to supply it to government bodies.

Sensitive Information

We do not process the following information in any manner:

- racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data and health data or data concerning a person's sex life or sexual orientation.

Rights of the Data Subjects

Each data subject has the following rights which may be exercised by contacting us. All the rights below have specific exceptions in certain cases. The requests will be processed within 30 days.

Right to access allows any data subject to request the following information from us:

- if its data is processed;
- which data is processed;
- which are the recipients or categories of recipients of personal data;
- data storage period;
- existence and nature of the rights to rectification/erasure/restriction/objection,
- existence of the right to lodge a complaint to supervisory authorities;
- sources of data;
- existence of profiling and automated decision making including their logic and consequences;
- existence of safeguards of international data transfers.

Right to rectification is the right to correct incorrect data and the right to complete the incomplete data.

Right to erasure ("to be forgotten") means that the data subject may request erasure of his or her data in the following cases:

- the data is no longer needed for the purposes of processing;
- consent for processing is withdrawn and no other grounds of processing apply where such processing is based on consent;
- data subject objects to processing;
- processing is unlawful;
- the data is related to a child and was processed in the context of offering a service directly to a child.

Right to restriction means that processing shall be restricted if:

- the data subject claims that the data is inaccurate and controller needs to verify if it's really inaccurate;

- processing is unlawful but the data subject wants processing to be restricted rather than the data to be erased;
- processing is no longer required for its purposes but the data subject requires it for specific purposes;
- processing is under objection but the controller needs to verify if objection is not overridden by legitimate interest of the controller.

Right to notification means that the data controller shall communicate the request of the data subject in exercise of his or her rights to each recipient unless it proves that it will take disproportionate effort.

Right to data portability means that data subject may request the data controller to provide collected data in structured and readable form.

Right to object means that the data subject based on its personal circumstances may override legitimate interests of the controller which constitute the basis for processing.

The data subject has the right not to be subject to profiling which significantly affects his or her interests.

Protection of Information

We take the following measures on protection of personal data to prevent the data breaches, misuse and the violation of rights of data subjects:

- Providing this Policy for review to any person or entity which is about to process the personal data.
- Keeping our officers and contractors responsible for proper data processing conducted by such officers and contractors.
- Providing advice to any officer, data subject or partner on the subject of compliance with this Policy.
- Making sure no access to personal data is provided to unauthorized parties.
- Using only reliable and tested software for processing or personal data.
- Assuming technical and organizational risks of data processing before such processing takes place.
- Ensuring that all actions in respect of the data are exercised by protected accounts to access the data and all data storages are available only to a limited number of persons on a password basis.
- Ensuring that we are able to suspend data processing or withdraw any piece of data from processing if we believe that such processing may violate applicable law.
- In case of change in any business process we will determine whether such change is data-related and check if such change falls in line with this Policy.
- Providing that each location and device where personal data may be stored is a safe environment.
- Utilizing firewall to minimize the risk of unauthorized access to the hosting infrastructure.
- Where necessary using third-party vendors to perform security assessments to identify issues with its data security that could result in security vulnerabilities.
- Providing encryption of most sensitive personal data.
- Ensuring ongoing confidentiality, integrity, availability and resilience of processing

systems and services.

- Providing the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident.
- Processing regular testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of the data processing.

Effective: 18.09.2023