

## Privacy Policy

Your privacy is very important to us. We want your work on the Internet to be as enjoyable and useful as possible, and you can safely use the widest range of information, tools and opportunities that the Internet offers.

We have created a Privacy Policy to demonstrate our commitment to confidentiality and security. The Privacy Policy describes how StartTrading (the "Company" or "our Company") collects information from all end users of its Internet services (the "Services"), including people who have access to some of our services without registering (the "Guests"), and customers who have purchased Products and/or pay monthly service fees to subscribe to the Service (the "Members"). The policy also includes an explanation of what we do with the information we collect, and what opportunities Guests and Members have to collect and use such information. We ask that you carefully review the Privacy Policy.

## Personal information that our company collects and how it is used

### Introduction

Members may be asked to provide certain personal information when subscribing to our Products or Services, such as name, address, telephone number, billing information (e.g., credit card number (without specifying the expiration date of the card and security code, of course) and the type of personal computer and operating system installed on it, which will be used to access the Services. The Members' personal information collected at registration (or at any other time) is primarily used to prepare the Products or Services according to your needs. Your information will not be shared or sold to third parties. However, we may disclose part of your personal information in the special cases described in the Disclosure section below.

### Disclosure

We reserve the right to disclose Member and Guest information to the following third parties in the following situations:

- To companies working on our behalf: We cooperate with other companies that perform business support functions on our behalf, and your personal information may be partially disclosed. We require such companies to use the information only for the purpose of providing contractual services; they are prohibited from sharing this information with other parties in situations other than those that require the agreed services. Examples of business support functions include fulfilling orders, issuing and delivering prizes and bonuses, conducting customer surveys and managing information systems. We also disclose aggregated non-personified information when selecting service providers.
- Subsidiaries and Joint Ventures: A subsidiary or joint venture is an entity in which the Company has an interest of at least 50%. When sharing your information with a subsidiary or joint venture partner, our Company requires that we do not disclose your information to other parties for marketing purposes or use your information in any way that is contrary to your choice. If you have indicated that you do not want to receive any marketing materials from our Company, we will not share your information with our subsidiary or joint venture partners for marketing purposes.
- Co- Positioned or Partner Pages: Our Company may share information with partner companies with whom it implements special offers and activities to promote the service (or product) on co-positioned pages of our site. If you request personal data on such pages, you will receive a warning about the transfer of information. The Partner will use any information you provide in

accordance with its own privacy statement, which you can read on the respective Partner's website before providing information about yourself.

- **Transfer of control:** Our Company reserves the right to transfer your personal data in connection with the sale or transfer of our company or its assets, in whole or in part. At sale or transfer of business, our Company will give you the opportunity to refuse to transfer information about yourself. In some cases, this may mean that the new entity will not be able to provide you with the services or products previously provided by our Company.
- **Law Enforcement:** Our Company may, without your consent, disclose personal information to third parties for any of the following reasons: to avoid violating a law, regulation or court order; to participate in government investigations; to assist in fraud prevention; or to enforce or protect the rights of the Company or its subsidiaries.
- **With your consent:** In all other cases our Company will obtain your explicit consent before passing on information about you to third parties. For example, if our Company may engage in a joint bid or tender with a third party, then we will ask your permission to share your personal information with the third party.

## **Online shopping**

When you order services or products directly from our Company, the personal information you provide is used to process this order. We will not share this information with third parties, except when necessary to fulfill such an order.

When placing an order through other companies that may link to our website, for example, by offering a gift via the Internet that is sent directly to the recipient, you may be asked to provide information about the recipient, such as name, address and telephone number. Our company has no control over how third parties use the personal information you provide when placing such orders. Please be careful in such cases.

We recommend that you read the Privacy Policy and Terms of Use of any other companies whose websites you may access from our site.

## **Posting information on the Internet**

Our company can publish information on the Internet. In such cases, we provide our performers with grouped and non-personalized information about our Guests and Members collected at registration and through online surveys and promotional activities.

In addition, in some cases we use this grouped and non-personalized information for targeted information and joint ventures. For example, the performer or joint venture tells us which audience we need to reach and provides recommendations accordingly. At a later stage, based on the non-personalized information collected and aggregated, we post or distribute the information to the intended audience. Our Company does not disclose personal information about its Guests and Members to such contractors or joint ventures. Information on how to opt-out of our Company's Internet-based information is included directly in our information materials.

## **Responses to electronic requests**

When Guests or Members send an email request to our company, the email address from which the request came is used to respond. Our company does not use the return addresses for any other purpose or pass them on to any third parties.

## **Voluntary customer surveys**

We periodically conduct both commercial and private user surveys. We encourage our customers to participate in these surveys because they provide us with important information that we can use to improve our various products and services and to improve the way we deliver them. Your personal information and responses will remain strictly confidential even when a third party conducts a survey. You do not need to participate in our customer surveys. Information on how to opt-out is included in survey communications.

We may take information from individuals participating in our client surveys and combine (group) the responses of our other clients to create broader and more comprehensive survey responses (e.g., gender, age, residence, hobbies, education, workplace, industry sector, and other demographic information). The grouped information is then used to improve the quality of our services to you and develop new services and products. Such grouped and non-personalized information may be shared with third parties.

## **Automatic data collection**

**Cookies:** Our Company may use cookies to collect information; these are small information files that your browser stores on your computer's hard drive when a website requests it. Our Cookie Tokies do not contain any personal information and are primarily used in the following ways:

- to track time information. For example, cookies allow us to track which images you upload and download;
- to enroll you in special programs. Cookies allow us to remember you when you sign in to areas of our website for which you are required to be a Member;
- to remember your country and language preferences;
- to help us understand our audience size and traffic distribution;
- to collect and record information about what you have viewed on our site and what you have viewed in our email;
- to manage and present site information and to understand what images can be displayed on your computer; and
- in order to provide you with information in accordance with your interests.

**Web Beacons:** We may also place small "tracking images" or "beacons" on our website, in internet advertising involving third parties and in our e-mails. Such beacons are used in conjunction with cookies to collect non-personal information about the use of our site, including, but not limited to, the time and date of the visit, pages viewed, transition page, browser type (e.g., Internet Explorer, Firefox, Chrome, Opera, Safari), operating system type (e.g., Windows, Linux, or MacOS), and domain name of the visitor's Internet service provider (e.g., AOL, Telecom or others). We collect such information about thousands of site visits and analyze it in general. This information is important, in particular, to determine the effectiveness of our Internet advertising, such as banners and choice of place for future advertising on other web resources.

**Disabling Cookies and Beacons:** If you do not like the collection of such information through cookies and beacons, we recommend that you disable these features in your browser settings, but please remember that this will limit the effectiveness and functionality of our website. How to disable cookies and beacons is usually described in your browser's instructions.

## **Child Information Protection**

Protection of children from Internet information is especially important, children under 13 years are protected by a special law. For this reason, our Company intentionally does not allow children under the age of 13 to become registered members of our websites or to purchase goods and services on our websites without parental consent. We do not knowingly collect or solicit personal information from children under the age of 13 without their parents' explicit consent.

If we ever include children under the age of 13 in the target audience of our website, these special pages will be highlighted and will contain a detailed privacy notice, in accordance with the provisions of the Children's Online Privacy Protection Act (COPPA); we will also provide mechanisms for parental consent, access to information, and enable parents to request the removal of their children's personal information.

Our Company welcomes parents and guardians who spend time online with their children and take part in their interactive lessons and hobbies.

## **Public forums**

A certain part of our website may provide access to public services such as discussion boards, online conferences, chat rooms, comments on various social networks and real-time events. When using such services, please be careful when posting information about yourself. Please note that personal information disclosed on such sites, such as your name, user name, email address, etc., may be collected and used for unsolicited mailings. Such services are open to the public, and what you publish there may be viewed by anyone - the information is unprotected. We are unable to control the comments that you may receive by participating in such services. You may find comments from other people offensive, dangerous or incorrect.

## **Our company's commitment to confidentiality**

We use various administrative, managerial and technical security measures to protect your personal information. Our Company adheres to various international control standards aimed at handling personal information, which include certain control measures to protect information collected on the Internet. Our employees are trained to understand and implement these controls and are familiar with our Privacy Notice, rules and instructions. However, while we strive to keep your personal information secure, you should also take steps to protect it. We strongly recommend that you take all possible precautions while online.

The services and websites we organize include measures to protect against leakage, unauthorized use and alteration of the information we control. While we do our best to ensure the integrity and security of our network and systems, we cannot guarantee that our security measures will prevent unauthorized access to this information by third party hackers.

## **Where to direct questions about our Privacy Policy**

If you have any questions about this Privacy Policy or the practices described above, you can contact us using the contact information on our website.

## **Changes to this Policy**

Our Company reserves the right at any time and in any way to edit, supplement or amend this policy, the Terms of Use and the Service Agreement and other policies and agreements of our Company, updating this page.