



PERSONAL DATA AND COOKIE PROCESSING POLICY

Our company REG-SMS LLP (reg. No OC451983) (Company, We, Us) respects and values Your (User, You) privacy and does everything possible to ensure the security of Your Personal Data (as defined below).

In this Privacy Policy (Policy) We provide information on the extent of the Personal Data collected, explain the reasons for its collection and way We use it, as well as identify third parties with whom Your data is shared.

This Policy is part of the reg-sms.org Public Offer. Please read this Policy carefully and contact us if You have any questions.

TERMS AND DEFINITIONS

If any of the words used in the text of the Policy begins with a capital letter, it must be understood and interpreted as provided for in this section.

1.	Website or REG-SMS	A website operated by the Company, located at: https://reg-sms.org/ .
2.	We, Us, Our and the Company	REG-SMS LLP (reg. No OC451983), addressed at 111 FULHAM PALACE ROAD LONDON UNITED KINGDOM W6 8JA, email: info@reg-sms.org .
3.	You, User	A person who meets all the requirements specified in the Agreement, who has Accepted the offer in order to receive Services from the Company via the Website.
4.	Offer	Reg-sms.org Public Offer, posted at: https://reg-sms.org/offer
5.	Personal Data	Generally means any information related to an identified or identifiable person that Users provide to Us during Registration, information that REG-SMS automatically collects about Users, information that Users provide to us on the terms of the Offer and feedback, as well as information about Users that we receive from third parties.
6.	Processing of Personal Data	Means a wide range of operations performed with Personal Data, including using manual or automated means of collecting, recording, organizing, structuring, storing, adapting or modifying, searching, consulting, using,

		disclosing by transferring, distributing or otherwise providing, coordinating or combining, limiting, deleting or destroying Personal Data.
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If this document uses any terms that have not been defined above or in the rest of the document, such terms must be understood as they are interpreted in the Offer, applicable laws and regulations, and only as a last resort in accordance with generally accepted practice.

POLICY ACCEPTANCE

If You agree with all and any provisions of the Policy, You can accept them by placing next to the field **"I have read and agree to the terms of the Personal Data and Cookie Processing Policy"** during Registration.

If at any time You do not agree with any of the provisions of this Policy, You must immediately stop using the Website.

What Personal Data Do We Collect?

To enable Your access to REG-SMS and the Services, We will ask You to provide Us with some important information about Yourself.

During Your use of REG-SMS and the Services, We may collect the following types of Personal Data:

Type	Personal Data
Communication Data	Email address; Other contact details that You use to contact us.
Registration Data	In case You use REG-SMS personally Name; Email address.
Automatically Collected Data	Technical information: Internet Protocol address(IP); Browser type and version; Setting the time zone; Types and versions of browser plugins; Operating system and platform. Usage data: Unified resource locators (URL) traffic flow to, through and from REG-SMS.org (including date and time); Products that the User viewed or searched for; Page response time; Loading errors; The time of visiting certain pages; Movement data;

	Methods used to navigate from the page; Other data collected through cookies and similar technologies.
Enhanced Verification Data	It is provided by You upon Our request on the terms of the Offer and may include the following data: Government identity document, such as passport; • National identity card; Driver's license; Utility bill; Any other information necessary to fulfill legal obligations in accordance with the law.

We are constantly developing REG-SMS and may add new features and Services to gain access to which We may ask You to provide additional information.

You provide Us with any Personal Data on a voluntary basis. At the same time, in case of Your refusal, We cannot guarantee the effective provision of Services and access to REG-SMS, and We also reserve the right to restrict Your access to REG-SMS and Services.

What is the purpose of Collecting Your Personal Data?

We collect the aforementioned Personal Data for the following purposes:

Personal data	Collection Purpose
Communication Data	To provide You with relevant feedback; To contact You for administrative reasons; To notify You of other products and services that You may be interested in.
Registration Data	To provide access to REG-SMS и Services; To ensure network and information security; To provide Service communications.
Automatically Collected Data	To ensure network and information security; To ensure normal functioning of the REG-SMS; To enhance Your REG-SMS experience; To indicate the errors and weak points of the REG-SMS and develop it;
Enhanced Verification Data	Conducting extended verification and ensuring the safety of REG-SMS.

We will only use Your Personal Data for the purposes for which We collected it, unless We reasonably consider that We need to use it for another reason and that reason is compatible with the original purpose, or we are obliged to process Your data by applicable laws

or court/enforceable orders. Where we need to use Your Personal Data for an unrelated purpose, we will notify You and We will explain the legal basis which allows us to do so.

How Do We Collect Your Personal Data?

We may collect Personal Data from Users in a variety of following ways:

Personal data	Collection Way
Communication Data	We get access to such Personal Data when You reach Us for any questions before Registration, to get customer service or for any other purposes (e.g. by email).
Registration Data	You provide Us with this Personal Data, when You fill in and submit relevant application forms and complete the required steps on the Website while Registration.
Automatically Collected Data	When You interact with REG-SMS, We may collect this Personal Data by using cookies, server logs and other similar technologies.
Enhanced Verification Data	We receive such Personal Data directly from You, as well as obtain it from other sources based on the Personal Data we have.

How Long Do We Keep Your Personal Data?

We will keep Your Personal Data for no longer than is necessary for the purpose of its collection.

Generally, We will retain and delete Your Personal Data as follows:

Personal data	Collection Period
Communication Data	We keep it until the moment We provided You with feedback.
Registration Data	We keep it strictly throughout the life of Your Personal Account.
Automatically Collected Data	We keep it strictly throughout the life of Your Personal Account.
Enhanced Verification Data	We keep it strictly throughout the life of Your Personal Account.

Personal data collected in accordance with our legal obligations, financial laws or anti-money laundering laws, other laws, **may be stored after the deletion of the Personal Account for as long as required in accordance with such laws.**

Please note, that We can keep Your Personal Data for a longer period where it is required by the relevant laws and regulations. We retain some of the Personal Data after the deletion of Your Personal Account in order to deter fraud, by ensuring that persons who try to commit fraud will not be able to avoid detection simply by closing their account and opening a new account, and to comply with Our legal obligations.

What are the Legal Basis For Processing Personal Data?

The processing of Personal Data is performed in accordance with privacy rights and regulations following the EU General Data Protection Regulation (GDPR) and our local regulations.

Where regulations of the country of Your location provide for stricter Personal Data standards, the processing of Your Personal Data will be effectuated in accordance with these standards.

Generally, the legal grounds for the Personal Data Processing could be listed as follows:

Your Consent. Insofar as You have granted Us consent to the processing of Personal Data for specific purposes, the lawfulness of such processing is based on Your consent. Giving Us Your consent to the processing of Your Personal Data is voluntary. Any consent granted may be revoked at any time. Please be advised that the revocation shall only have effect for the future. Any processing that was carried out prior to the revocation shall not be affected thereby.

Agreement performance. It means processing Your data where it is necessary for the performance of an agreement to which You are a party or to take steps at Your request before concluding an agreement. Such agreements include the Offer.

Our Legitimate Interest. It means Our interest to conduct and manage Our business affairs appropriately and responsibly, to protect the reputation of our business, and to provide You with the best possible Services and secure experience.

Legal Compliance. We process Your Personal Data where it is necessary for compliance with a legal or regulatory obligation.

Do We Transfer or Share Your Personal Data To (With) Others?

We sometimes need to share Your Personal Data with third parties. Please find below the exhaustive list of third parties with whom We may share Your Personal Data:

1. Business partners, suppliers and sub-contractors in order to provide You the Services.

We require all affiliated entities to respect the security of Your Personal Data and to treat it in accordance with the law. We do not allow them to use Your Personal Data for their own purposes and only permit them to process Your Personal Data for specified purposes and in accordance with our documented instructions.

Please note, Third-Party Service Providers do not fall under the criteria of affiliated entities. We do not share Your Personal Data with them.

2. Courts and(or) government authorities and(or) law enforcement officials in cases where it is required by the laws and regulations.

We will only use and share Your Personal Data where it is necessary for Us to lawfully carry out our business activities.

3. Analytics and search engine providers that assist the Company in the improvement and optimization of REG-SMS.

We can guarantee You, that We will not sell, exchange, or share with any third parties Your Personal Data without Your express consent.

Do We Transfer Your Personal Data Overseas?

We store Your Personal Data mainly **in Netherlands**. However, in order to facilitate our global operations, our Company may use the services of foreign data processing service providers, unless the laws and regulations of Your jurisdiction restrict such data transfer. For example, if You are a citizen of the Russian Federation, we will store Your data on the territory of the Russian Federation.

We hereby warrant You that We will only transfer Your Personal Data to countries that have been deemed to provide an adequate level of protection for Personal Data by the European Commission. We will make all possible efforts to ensure protection of Your Personal Data in accordance with this Privacy Policy wherever Your Personal Data is processed and will take appropriate contractual or other steps to protect the relevant Personal Data in accordance with applicable laws.

Where such service providers are not established in a country ensuring an adequate level of protection within the meaning of Regulation (EU) 2016/679, such as the United States, the transfers will be covered by the standard data protection clauses adopted by the European Commission or by another appropriate safeguard mechanism such as the Privacy Shield Framework.

How We Secure Your Personal Data?

We have implemented a number of technical, organizational and administrative measures to ensure the confidentiality, integrity, availability and privacy of Your Personal Data and to protect Your Personal Data from loss, theft, unauthorised access, misuse, alteration or destruction which are generally accepted by the industry to protect the Personal Data in its possession.

These measures include, but are not limited to the implementation of current security technologies: Secure Sockets Layered (SSL) technology to ensure that Your Personal Data is

fully encrypted and sent across the Internet securely, secure coding principles, and regular penetration testing.

We also use encryption (HTTPS/TLS) to protect data transmitted to and from REG-SMS. Transport Layer Security (TLS) is a protocol that provides privacy and data integrity between two communicating applications. It's the most widely deployed security protocol used today, and is used for Web browsers and other applications that require data to be securely exchanged over a network, such as file transfers, VPN connections, instant messaging and voice over IP.

Only authorized Company personnel have access to the Personal Data, and these personnel are required to treat the Personal Data as confidential. The security measures in place will, from time to time, be reviewed in line with legal and technical developments.

Your Rights

Your principal rights as the Personal Data subject include the following:

- 1. Right to access Personal Data.** You may request Us to provide You a copy of Your Personal Data that we have access to. We will provide You such information within a reasonable time period and may require You to compensate for the expenses associated with gathering the information.
- 2. Right to Personal Data rectification.** You may request Us to rectify or update any of Your Personal Data. You can do this with the use of relevant REG-SMS functionality or by contacting us directly. The Company reserves the right to reject personal assistance where rectification of Personal Data is available through the REG-SMS functionality.
- 3. Right to Personal Data deletion.** You may request Us to erase Your Personal Data, subject to applicable law. Please note, that in some cases REG-SMS will automatically delete Your Personal Data when You delete Your Personal Account. However, if You delete Your Personal Account, We will not use Your Personal Data for any further purposes, nor share it with third parties, except as required by the law. Please note, that We may not always be able to comply with Your request of erasure for specific legal reasons which will be notified to You, if applicable, at the time of Your request.
- 4. Right to withdraw consent.** To the extent the processing of Your Personal Data is based only on Your consent, You may withdraw Your consent at any time. This will not affect the lawfulness of any processing which was carried out before the withdrawal. Please note, any processing activities that are not based on Your consent will remain unaffected.
- 5. Right to restrict processing.** In some jurisdictions, applicable law may give You the right to restrict or object to Us processing or transferring Your Personal Data under certain circumstances. We may continue to process Your Personal Data if it is necessary for the defense of legal claims, or for any other exceptions permitted by applicable law.

Kindly note that none of the aforementioned rights are absolute, meaning that they must generally be weighed against Our own legal obligations and legitimate interests. If a decision

is taken to override Your request, You will be informed of this by Us along with the reasons for our decision.

COOKIES

What are ‘cookies’?

The Cookie is a small text file that can be stored on Your device when You visit websites. Certain information is saved in this text file, such as the choice of website language. When You visit the website again, this cookie is sent to the website. This way, the website recognizes Your browser and may, for example, save Your language preferences.

Cookies usually have an “expiration date” which indicates how long they are kept on Your device. For example, some cookies are automatically deleted when You close Your browser (so-called session cookies) while others stay on Your device for a longer time, sometimes until You delete them manually - we call them permanent cookies.

With the exception of the cases specified in this Policy, the cookies We use are necessary for the functionality and effectiveness of the Website, for example, by making the Website more efficient and facilitating the use of the functionality and services provided; these functional and/or operational cookies will be deleted from Your device at the end of the browser session (session cookies). We will not use the information stored in the mandatory Cookies for any other purposes, except in case of extreme necessity to provide You with the requested Services and functionality.

When You visit the Website for the first time, We suggest that You read and accept the Policy. At the same time, **We may ask You to choose whether You agree to the processing of Cookies (with the exception of the necessary cookies, without which the normal functioning of the Website is impossible, You can refuse the processing of Cookies), and confirm Your consent to the Policy.**

By continuing to use the Website, You agree to the placement of cookies in Your browser and device in accordance with this Policy.

Tracking technologies (such as cookies) can be **permanent** (i.e. they are stored on Your computer until You delete them) or **temporary** (i.e. they are stored until You close Your browser).

Some of the cookies we use are listed below. This list is not exhaustive, but it gives an idea of the main directions of using Cookies. When You visit the Website, the Cookies described below may be installed on Your device.

Cookie	Function	Retention period
_csrf	Random key to check security when submitting a form	session
_csrf_admin	Random key to check security when submitting a form	session
authToken	The authorization token of the registered user	session

currentCountryId	Selected country ID	session
_adminIdentity	Token of the administrative panel session	30 days
sessionToken	Session token, to save the user's session	30 days
traffic	Type of traffic source	30 days

We can use both permanent and session cookies, as well as their varieties for the operation of the Website:

Mandatory Cookies – they are necessary for the normal functioning of the Website.

Analytical and operational cookies - allow You to track traffic to the Website.

Cookies can be used to create statistics that help You understand exactly how visitors use the Website.

ENABLING AND DISABLING COOKIES AND SIMILAR FUNCTIONS

You have the option to accept or reject all Cookies on all sites that You visit by changing the settings in Your Internet browser. For example, when You use Internet Explorer version 11.0 You should do the following:

- 1) choose «Settings», then «Browser Properties»;
- 2) go to the «Privacy» tab;
- 3) using the mouse, select Your preferred settings.

Each browser needs to use its own settings to change and delete Cookies. Please note that certain functionality of the Website may not be available when Cookies are disabled. To learn more about how to adjust or change Your browser settings, refer to the browser instructions or at www.aboutcookies.org (available in English) or allaboutcookies.org (available in English, Spanish, German, French).

If You use different devices to access the Website (e.g. smartphone, tablet, computer, etc.), You should make sure that each browser on each device is configured according to Your Cookie preferences.

LINKS TO OTHER WEBSITES

REG-SMS may contain links to external websites/platforms supported by Third-Party Service Providers whose Personal Data and privacy policies differ from Ours.

The Company is not responsible for Personal Data or privacy practices used by such third parties. We strongly recommend that You review the privacy policies of all third-party websites before using such websites or providing any Personal Data or any other Information on or through such websites.

POLICY AMENDMENT

This Policy may be revised, updated and(or) amended at any time without prior notice at the Company's discretion. Where such amendments are made, the date when this Policy was updated will be displayed on the first page of the Policy.

The User undertakes at own risk to keep himself/herself updated with the Policy amendments. We strongly recommend that Users do the following: (i) memorize/make a note of the date of last update provided in the document (e.g., to save its copy) upon the initial registration of Personal Account and any time upon amendment of the Policy, (ii) visit on a regular basis the relevant page of the Website / section of the Annex and study the entire Policy in case of change in the update date.

If You do not agree with any changes to the Policy, You must immediately stop using REG-SMS and delete Your Personal Account.

CONTACT US

If anything is left unclear in the text of this Policy, we will be happy to clarify its provisions.

You may also use the contact details provided in this section for any reason provided for in this Policy.

For questions related to this Policy, please contact us via email info@reg-sms.org.