

PRIVACY POLICY

WHEN USING THE MOBILE APPLICATION

“Gerchik & CO”

(hereinafter referred to as the “Private Policy”)

date: 01.05.2024

Gerchik & Co Ltd. takes information privacy issues seriously and is governed by all applicable data privacy laws, so we would like to familiarize you with how we collect, use and disclose this type of information.

Applicable data privacy laws means all laws and regulations, including those issued by the relevant supervisory authorities, that protect the fundamental rights and freedoms of individuals and, in particular, their right to privacy with respect to the processing of personal data, including but not limited to data protection laws and regulations implementing Regulation (EC) 2016/679 of the European Parliament and of the Council dd. 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the “General Data Protection Regulation” and/or “GDPR”).

The Gerchik & CO mobile application (hereinafter referred to as the “Application”) is developed, provided and maintained by Gerchik & Co Ltd. (hereinafter referred to as the “Company”, “We”). If you install and use the Application, we will collect data about you. This Privacy Policy describes what data we collect, how we use it, and where you can go if you have any questions or concerns.

By providing us with your personal information or by using the Application, you agree to the terms and conditions of this Privacy Policy.

If you disagree with the terms of the Privacy Policy, you must refrain from using the Application.

1. Types of data we collect

Personal data, or otherwise personal information, means any information about an individual that allows him or her to be accurately identified. It does not include information that is of an impersonal nature.

If you choose to download and install our App, we may collect, use, store and transmit various types of personal data about you, which we group into the following criteria:

- Personal data, such as the User's first and last name.
- Contact details, which include physical address, email and telephone number.
- Geodata, which includes approximate geodata of the User and/or his electronic device.

- User content, including graphic and text messages, photos, video files provided by the User.
- Technical data, which includes device ID, user ID, its IP address, login data, user browser type and version, time zone, settings and localizations, types and versions of plug-ins used in the browser, operating systems and platforms, as well as other technological data of your device that you use to access this Application. For example, we use the App Tracking Transparency (ATT) feature to request your unique device identifier (IDFA). IDFA allows us to identify users who switch between apps and measure the effectiveness of ads. In this way, we can find out if the user installed the application, coming from a particular advertising campaign on Facebook or other social networks.
- User information, including information about how you have used our Application, such as the number of visits and which features in the Application you use. For example, we monitor the registration of internal events that the user performs in the Application after it is installed. This helps us understand the quality of users in order to target ads to the audience that will benefit from our Application, as well as to identify the most effective media sources.
- Marketing and communications information, including your communications and marketing preferences, whether with us or with third parties.
- Diagnostic data. This type of information includes data on failures, performance, as well as other technical data that allow to judge with objective accuracy the current technical condition of the hardware and software of the electronic device through which the User connects and works in the Application.
- Other data. Any other data not mentioned above.

Also, we collect, use and distribute Summary Data, which includes any statistical and demographic data. Aggregate Data may be derived from your Personal Data, but is not considered as such under data protection regulations, as such data does not directly or indirectly identify you. For example, we may analyze your user data to determine the frequency of user access to a particular feature of the Application. In any case, if we combine or link Aggregate Data with your Personal Data that would allow us to directly or indirectly identify you, we treat such data as Personal Data and use it in accordance with the rules set out in this Privacy Notice.

We do not collect certain types of personal data about you (including information about your race or ethnic origin, religion or philosophical beliefs, sexual life or orientation, political views, trade union membership, health information, genetic information or biometric data). Also, we do not collect information about criminal offences or misdemeanors.

If you want to download and install our Application, we will ask you for information such as name, e-mail, phone number, username and password, geodata (geographical location information), and if necessary, information about your mobile device, IP address (unique network address of a node in an IP-based computer network), connection point address, access time, and Application activity.

Please make sure that the data you provide is accurate and up to date, and update it in a timely manner in case of changes.

We do not knowingly collect personal data from anyone under the age of 18. If you become aware that such a person has provided us with personal data without parental or legal guardian consent, please contact us. If we became aware that a person under the age of 18 has provided us with personal data without parental or legal guardian consent, we will take steps to delete the data and cancel the person's account.

2. What we do with the collected data

We use the data collected through the Application to:

- a) identifying you as a user of the Application;
- b) ensuring the uninterrupted operation of our Application, as well as providing you with information;
- c) answers to your questions;
- d) providing you with technical support services;
- e) internal analysis and research, identifying trends in the use of the Application in order to improve it;
- f) sending you administrative messages;
- g) detection and prevention of fraud cases and abuse when using the Application;
- h) track users' location.

The Company generally does not verify the authenticity of personal information provided by users and does not monitor their competence. However, the Company assumes that the information transmitted to it from users is accurate and keeps this information up to date.

3. Access to data by third parties

Our affiliated companies and counterparties may access your data in order to process it for our purposes, as well as to provide you with information at your request.

Your personal data may not be disclosed to third parties other than in accordance with the procedure established by applicable law. If such a transfer takes place, such persons will take all security measures at least similar to those applied by the Company.

We require all third parties to respect the security of your personal data and to treat it in accordance with legal requirements. We do not give affiliated third parties who provide services to us the right to use your personal data for their personal purposes, but only give them

permission to process your personal data for the separately agreed purposes and in accordance with our instructions.

4. Security

We take all commercially reasonable organizational and technical measures to prevent unauthorized access by third parties to your personal data obtained in connection with the use of the Application.

In addition, we provide access to your personal data only to those employees, agents, contractors and third parties who have a genuine need to know it in the course of their business activities. They will only process your personal data in accordance with our instructions and have a duty of confidentiality. We have implemented procedures to deal with any suspected leak of personal data and will notify both you and the regulator of a breach, where the duty to do so is required by law.

The application runs in an isolated area of your mobile device's memory, access to third-party applications is denied. The security of user data is ensured at the level of the iOS operating system.

We cannot guarantee that there will be no misuse of your personal data by a data breach. Please keep the passwords for your accounts in a secure place and do not disclose them to any third parties. If you become aware of unauthorized use of your password or any other breach of security, contact us immediately.

5. Change of this Privacy Policy

We may change this Privacy Policy at any time unilaterally by changing this Privacy Policy and posting the revised Privacy Policy in the Application. The new Privacy Policy is effective as of its posting in the Application, unless otherwise provided for in the new Privacy Policy. You acknowledge and agree that it is your responsibility to review periodically the Mobile Application Agreement and this Privacy Policy to review any changes. Your continued use of the Application after such changes will constitute your acceptance of and agreement to the modified Mobile Application Agreement and/or Privacy Policy.

6. Your rights

We take steps to ensure that your Personal Data is accurate and up to date. If you reside in the European Economic Area, you have certain rights to the Personal Data we have collected about you. To exercise your rights to your Personal Data, contact us through our customer support team or at the address below.

You have the following rights:

- Right of access to your Personal Data (Article 15 GDPR): you have the right to request us to confirm whether we process your Personal Data, as well as access to Personal Data and relevant information about this processing (such as the purposes of processing or categories of Personal Data involved).

- Right to rectification (Article 16 GDPR): you have the right to have your personal data rectified in accordance with the law.

- Right to erasure (Article 17 GDPR): you have the right to ask us to delete your personal data in accordance with the law. This right may be exercised when, among other things: (i) your Personal Data is no longer needed for the purposes for which it was collected or otherwise processed; (ii) when you withdraw the consent on which the processing is based under Article 6(1)(a) or Article 9(2)(a) GDPR and when there is no other legal basis for the processing; (iii) when you object to processing under Article 21(1) GDPR and there is no underlying legal basis for processing, or when you object to processing under Article 21(2) GDPR; or (iv) when your Personal Data has been processed illegally.

You have the right to independently initiate the deletion of your personal data in the Application using a separate option that is available in the Application or by following the link: <https://edudeclaration.com/>. This action will:

- deletion of your personal data stored in the Application;
- loss of access to your account in the Application;
- loss of all results of your activity in the Application.

- Right to restrict processing (Article 18 GDPR): you have the right to request restriction of our processing under certain circumstances, including: when the accuracy of your Personal Data is challenged; when the processing is unlawful and you object to the deletion of your Personal Data and instead request a restriction on the use of your Personal Data; or if you object to the processing in accordance with Article 21(1) of the GDPR.

- Right to data portability (Article 20 GDPR): you have the right to receive the personal data that you have provided to us in a structured, commonly used and machine-readable format, and you have the right to initiate the transfer of this information to another controller, including direct transfer, if technically possible.

- Right to object (Article 21 GDPR): you have the right to object to us processing your personal data as required by law. This right is limited to processing under Article 6(1) (e) or (f) of the GDPR and includes profiling based on these provisions and processing for direct marketing purposes. Thereafter, we will no longer process your Personal Data unless we can demonstrate a compelling legal basis for processing that overrides your interests, rights and freedoms, or for creating, exercising or defending legal claims.

7. Termination of use of the Application

We reserve the right to terminate your use of the Application for any reason, including but not limited to a breach of the Mobile Application Agreement and/or the Privacy Policy. You may also stop using the Application at any time.

8. Cookies and similar technologies

When you use the Application, cookies and similar technologies (pixels, web beacons, scripts) may be used. A cookie is a text file containing a small amount of information that is downloaded to your device when you access the Application. The text file is then sent back to the server each time you use the App. This allows us to manage the Application more efficiently. For example, we track users' location, will know how many users have access to certain areas or features in our Application and which links or advertisements they have clicked. We use this aggregated information to understand and optimize your use of our Application, improve our marketing efforts, and provide content and features that interest you. We may ask advertisers or other partners to show advertisement or services in the Application that may use cookies or similar technologies.

9. Feedback. Questions and suggestions

If you have any questions about your personal data, please contact our customer service team: support@gerchik.co

We have designated a Data Protection Officer to oversee the management of your personal information in accordance with this Privacy Policy.

If at any time you decide you no longer wish to receive any information or communications from us, please email us at support@gerchik.co and we will stop mailing you.