

PRIVACY POLICY

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The Privacy Policy regulates the procedure for ensuring the privacy of Personal Data.

The provisions of this Privacy Policy describe how VVMD processes, stores, and collects Personal Data.

We have developed this Privacy Policy to describe how Personal Data is stored and protected.

During the implementation of its activities, the Company may use your Personal Data in various ways, including when providing Services. That is why we have developed this document so that each Client has the opportunity to familiarize himself with the ways in which his Personal Data is used or to decide to refuse such use.

The Company may disseminate Personal Data during its activities. The Privacy Policy describes Third Parties that may receive your data.

References to the words "you," "you," or "yours" (or similar words in meaning) mean our Client, depending on the context of the Privacy Policy.

The provisions of this Privacy Policy apply only to Personal Data obtained by the Company in the ways described in its conditions. VVMD is in no way responsible for processing Personal Data by third parties, including a natural or legal entity, who may receive Personal Data under the terms of this Privacy Policy.

During the processing of the Client's Personal Data, the Company is guided by the General Data Protection Regulation (EU) 2016/679 of April 27, 2016, which is the most common and basic in the world.

We thank you for using the Services of our Company.

1. DEFINITIONS

- 1.1. **Client** - an individual or legal entity that interacts with the Company to receive the Services.
- 1.2. **Controller** - means any natural or legal person, government agency, institution, or other body that independently determines the purposes and means of personal data processing.
- 1.3. **Cookies** - are a piece of information in the form of text or binary data is transmitted to the browser from the site.
- 1.4. **Client's Consent (hereinafter "Consent")** - means a voluntary, specific, informed, and unequivocal expression of will, in which the Client using a statement or explicit affirmative action agrees to the processing of his Personal Data.
- 1.5. **Personal Data** - means any information that directly or indirectly allows identifying the Client. For example, name, surname, phone number, IP address.

- 1.6. **VVMD Site (hereinafter "Site")** - means a web page or group of web pages on the Internet, which are located at: <https://vvmteam.com/>
- 1.7. **VVMD (hereinafter referred to as the "Company" or "VVMD")** - is a service that allows the Client to receive Services in the field of web development and web design.
- 1.8. **Processor** - is a natural or legal person, government agency, institution, or other body that processes Personal Data on behalf of and behalf of the Controller.
- 1.9. **Pop-up form** - is an element of the Site's interface displayed on top of the Site's web page in a browser and is used to obtain additional information and/or obtain Consent.
- 1.10. **Third Party** - means a natural or legal person, government agency, institution, or body other than the Client, Controller, Processor, and persons authorized by the Controller or Processor under their direct supervision to process Personal Data.

2. GENERAL PROVISIONS

- 2.1. The Company processes and stores Personal Data based on the principles of legality, fairness and transparency by [Article 5 "Principles relating to processing of personal data" of the GDPR](#).
- 2.2. The Company acts as a Processor of Personal Data that it receives as a result of providing Services to the Client.
- 2.3. The Company is not responsible for the processing of Personal Data by third parties that are not controlled or owned by VVMD.

3. PERSONAL DATA

- 3.1. The Company receives the following Personal Data about the Client:
 - 3.1.1. full name;
 - 3.1.2. e-mail;
 - 3.1.3. contact phone number;
 - 3.1.4. address: country, city;
 - 3.1.5. Facebook Messenger account;
 - 3.1.6. WhatsApp account.
- 3.2. *The Client may provide any of his Personal Data when filling in the section details of the project feedback form, in which case the Company processes such data by the terms of this Privacy Policy.*
- 3.3. If the Client is a legal entity, the Company has the right to collect and process statistical data of such Client, namely: name, legal and actual address, bank details, etc. The statistics obtained are stored and processed in accordance with the terms of this Privacy Policy.
- 3.4. The Company has the right to receive Personal Data of representatives, employees, partners, co-employees of the Client's legal entity, including, but not limited to: full name; contact details; data from social networks and messengers, bank details (only if necessary); by e-mail; place of residence, etc.

- 3.5. *The Company reserves the right to verify the representative of the Client's legal entity by requesting information from him that he is a representative of the Client's legal entity. If the representative does not provide such information, the Company has the right to terminate the provision of Services to such Client.***
- 3.6. When you visit the Site or receive the Services, VVMD may collect the following Personal Data automatically:
- 3.6.1. IP address;
 - 3.6.2. time zone and language settings;
 - 3.6.3. browser type and version;
 - 3.6.4. operating system, device type and screen extension;
 - 3.6.5. location country;
 - 3.6.6. information about your visit to the Site, including complete details on the URL, route to and from the Site (including date and time), page response time, data loading errors, length of stay on certain pages, activity on the page (such information such as scrolling and mouse movements, clicks), methods used to exit the page, and phone numbers for contacting the service center.
- 3.7. *VVMD does not collect or process sensitive Personal Data of Clients, such as race or ethnic origin, political views, religious or philosophical beliefs, union membership, genetic or biometric data, health information, sexual life or sexual orientation.***
- 3.8. *VVMD has the right to collect and receive the Personal Data of the Client as follows:***
- 3.8.1. when providing Services;
 - 3.8.2. when placing an order with the Client;
 - 3.8.3. during the Client's description of the project;
 - 3.8.4. when interacting with employees of the Companies, by exchanging e-mails, messages on social networks and messengers, telephone calls;
 - 3.8.5. use of log files, Cookies and other tracking technologies;
 - 3.8.6. through the use of messengers and social networks;
 - 3.8.7. when using a Pop-up form;
 - 3.8.8. when signing any documents between the Client and the Company, including but not limited to: agreements, contracts, invoices, etc.
- 3.9. *The Company has the right to use Personal Data for the following purposes:***
- 3.9.1. to provide Services;
 - 3.9.2. to ensure the security of the Site;
 - 3.9.3. to administer the Site and conduct internal operations, including troubleshooting, data analysis, testing and
 - 3.9.4. improve the navigation of the Site based on your preferences;
 - 3.9.5. communication with the Client;
 - 3.9.6. to respond to requests from law enforcement agencies;
 - 3.9.7. to respond to lawsuits, investigate or resolve disputes with the Client.
- 3.10. *During the processing of Personal Data, the Company uses the CRM system and the data may be transferred to the Company's employees using the CRM systems. The Company provides storage***

and protection of Personal Data in case of their transfer to the Company's employees using the CRM system.

- 3.11. The Company reserves the right to obtain additional information and/or Personal Data of the Client for the provision of Services. If the Client refuses to provide such information or Personal Data, the Company has the right to terminate any relationship with such Client.
- 3.12. *The Company has the right to obtain Client Personal Data through the use of social networks, including, but not limited to: Facebook, Instagram.*

4. PERSONAL DATA TRANSFER

- 4.1. The Company has the right to transfer Personal Data to Third Parties for the implementation and provision of the Services and/or protection of its legal interests:
- 4.1.1. **Contractors and employees.** The Company may transfer Personal Data to other entities with which it will cooperate, including legal and tax consultants and entities that provide accounting, marketing and IT services.
 - 4.1.2. **Courts, law enforcement, and government agencies.** The Company has the right to transfer Personal Data in the event of fulfilling any legal obligations, including in connection with a court ruling.
 - 4.1.3. **Third Party.** The Company has the right to disclose or transfer the Client's Personal Data during the following transactions: acquisition or merger, financing, corporate reorganization, joint venture, including the sale of assets or in the event of bankruptcy.

5. CLIENT CONSENT

- 5.1. The following actions of the Client are considered to be the Consent of the Client to the terms of processing of Personal Data:
- 5.1.1. filling in the "project discussion" form;
 - 5.1.2. conclusion of any contract or other contractual document with the Company;
 - 5.1.3. giving Consent by filling out a feedback form.
- 5.2. The Company reserves the right to obtain the Client's Consent through a Pop-up form. The Pop-up form may contain the Consent form in the flag submission.

6. PERSONAL DATA STORAGE AND PROTECTION

- 6.1. The Company uses all necessary security and protection measures for Personal Data to ensure its confidentiality and prevents loss or misrepresentation.
- 6.2. The Company protects and stores Personal Data from:
- 6.2.1. losses;
 - 6.2.2. illegal use, transfer, disclosure, alteration, removal and/or destruction.

- 6.3. Personal data may be transferred and stored outside the European Economic Area ("EEA") to provide you with our Services. Please note that Personal Data may be transferred to Third Parties outside the EEA. In case of transfer of Personal Data to a Third Party, such person is responsible for the storage and processing of Personal Data.
- 6.4. We may use the following methods to protect Personal Data in accordance with the [article "Security of processing" 32 GDPR](#):
- 6.4.1. pseudonymization and encryption of Personal Data;
 - 6.4.2. ability to ensure constant confidentiality, integrity, availability and fault tolerance of Personal Data processing systems;
 - 6.4.3. regular testing, evaluation and measurement of the effectiveness of technical and organizational measures to ensure the security of processing Personal Data.
- 6.5. The Company may delete a Client's Personal Data upon receipt of a request from the Client and upon the termination of the relationship. By deleting Personal Data, we mean deleting all Personal Data from servers and/or written media.
- 6.6. VVMD has the right to retain the Personal Data of Clients for **5 (five) years** after the termination of the relationship in the following cases:
- 6.6.1. for statistical accounting;
 - 6.6.2. if the current legislation requires their storage;
 - 6.6.3. if they are necessary for doing business.
- 6.7. The Company does not store the Client's Personal Data in the event of a request to delete Personal Data on his behalf in accordance with the right to delete, as provided in [Article 17 of the "Right to Erase" GDPR](#).
- 6.8. VVMD has the right not to delete Personal Data in the event of a reorganization of the company, the merger of VVMD with another company, or any other changes in the structure of VVMD, and in the event of a change of server.

7. BASIS FOR PROCESSING PERSONAL DATA

- 7.1. The Company collects and processes Personal Data in accordance with the General Data Protection Regulation.
- 7.2. The Company processes Personal Data based on the following legal grounds:
- 7.2.1. Client's Consent;
 - 7.2.2. Services provision to the Client;
 - 7.2.3. to comply with applicable law, for the proper level of our business, to enter into and execute corporate transactions (sale of shares/stocks, mergers, acquisitions), to fulfill its obligations to you and/or a Third Party.
- 7.3. In cases where the basis for the processing of Personal Data is your Consent, you have the right to revoke it at any time. In the event of withdrawal of your Consent, the Company has the right to terminate the provision of the Services and terminate all relations with you. If the Consent is revoked, your Personal Data will be permanently deleted.

- 7.4. The Company undertakes to stop processing Personal Data within 10 (ten) business days from the date of receipt of the withdrawal of the Consent.

8. CLIENTS RIGHTS

- 8.1. The terms of this section apply to residents of the European Union and the European Economic Area. By the terms of this clause, the Client has the following rights:
- 8.1.1. **Right of access.** The Privacy Policy lists the Personal Data of the Client. The Client may contact us directly to request access to the Personal Data we hold about them, as well as to any information in accordance with [Article 15 of the General Data Protection Regulations](#).
 - 8.1.2. **Right to erase.** The Client has the right to delete Personal Data about himself, in accordance with [Article 17 of the General Data Protection Regulations](#). Personal Data, in this case, will be deleted forever.
 - 8.1.3. **Right to rectification.** The Client has access to Personal Data, which must be updated, corrected, and supplemented at any time. The Client may also contact the Client support of the Company to access his Personal Data to correct, change, or delete it according to [Article 16 of the General Data Protection Regulations](#).
 - 8.1.4. **Right to data portability.** We may send the Personal Data Clients to third parties at the request of the Client, in accordance with [Article 20 of the General Data Protection Regulations](#).
 - 8.1.5. **Right to object.** The Client has the right at any time to object to the processing of their Personal Data in accordance with [Article 21 of the General Data Protection Regulations](#).
- 8.2. The Client must provide sufficient information to confirm his identity, whose Personal Data are processed by the Company. If the Client cannot confirm his/her identity, the Company has the right not to fulfill such a request until the confirmation of such identity.
- 8.3. The Client's request must contain accurate information on the requirements it places on the Company. If the request does not specify the exact requirements, the Company has the right to refuse to fulfill the request.
- 8.4. *We will not be able to respond to your request or provide you with Personal Data unless we are able to verify your identity or authority and confirm that the Personal Data relates to you. In case of receiving a request with inaccurate information and/or in case of impossibility to verify the identity of the Client, the Company has the right not to process the received request and apply to the Client for clarifications. If a request for clarification is received, the Client is obliged to submit a new corrected request or submit a new request.*
- 8.5. *The Company must respond to the request or fulfill the conditions outlined in the request within 21 (twenty-one) business days from the date of receipt.*

9. RESPONSIBILITY

- 9.1. The Company notifies the Client that its Personal Data may be used to provide the Services, and in case of disagreement, the Client must leave the Site and not use the Company Services.
- 9.2. The Company has the right to collect the Personal Data of the Client to obtain statistical data.
- 9.3. The Company is not responsible for:
 - 9.3.1. loss of Personal Data in the event of a hacker attack, hacking of the Site software, illegal actions of third parties, illegal actions of the Client and actions that violate the terms of the Privacy Policy;
 - 9.3.2. provision by the Client of inaccurate information and/or Personal Data.

9.4. Unfortunately, the transmission of information via the Internet may not be completely secure. Although we make every effort to protect your Personal Data, we cannot guarantee the secure process of transferring your Personal Data to our Site. In this regard, you are solely responsible for possible failures in sharing your Personal Data with the Site. Upon receipt of your Personal Data, we undertake the necessary technical and security measures to prevent unauthorized access to your Personal Data.

10. ADULT POLICY

- 10.1. The Company Services are intended for adults Clients. The Company does not process the Personal Data of minors.
- 10.2. VVMD has the right to delete the Personal Data of a minor, without warning and any consequences for the Company, and to terminate the provision of such person to the Services.
- 10.3. If you have information about the use of the Services by a minor, please contact Company support by sending an email to: vvmd.team@gmail.com.

11. CHANGES TO THE PRIVACY POLICY

- 11.1. The Company has the right to change the Privacy Policy provisions to ensure the preservation of Personal Data and in case of changes in the legislation governing the processing of Personal Data.
- 11.2. The Client is obliged to familiarize himself with the new terms of the Privacy Policy, and the Company is not responsible if the Client has not read the new terms of the Privacy Policy.
- 11.3. Electronic or otherwise saved copies of the Privacy Policy are considered authentic, complete, valid, and subject to compliance with the versions of the Privacy Policy at the time the Client visits the Site. If the Client uses the Services, then he agrees with the new rules for the processing of Personal Data.

12. CONTACTS

- 12.1. The Client has the right to contact the support service of the Company at: vvmd.team@gmail.com to ensure his rights, by the terms of this Privacy Policy, or in case of violation of his rights, or to leave a response or ask questions.