

Sinimart Privacy Policy

These Grafix Design OÜ privacy terms govern your visit and use of the Sinimart Platform on our website www.sinimart.com (Site) and all related websites, downloadable software, mobile applications, and other services provided by us and all other communications with individuals (collectively “Service”).

This Privacy Policy (“Policy”) describes the information that we gather on or through the Service, how we use and disclose such information, and the steps we take to protect such information. By visiting the Site, or by purchasing or using the Service, you consent to the privacy practices described in this Policy.

This Policy is incorporated into, and is subject to, the Sinimart Terms of Service. Capitalized terms used, but not defined, in this Policy have the meaning given to them in the Sinimart Terms of Service.

Definitions

Personal Data means information that specifically identifies an individual or that is linked to information that identifies a specific individual.

Public Area means the area of the Site that can be accessed both by Users and Visitors, without need to log in.

Restricted Area means the area of the Site that can be accessed only by Users, and where access requires log in.

Visitor means an individual other than a User, who uses the public area, but has no access to the restricted areas of the Site or Service.

The following types of information is collected by us from or through the Service.

- **User-provided Information.** When you use the Service, as a User or as a Visitor, you may provide, and we may collect Personal Data. Examples of Personal Data include name, email address, mailing address, mobile phone number, and credit card or other billing information. Personal Data also includes other information, such as geographic area or preferences, when any such information is linked to information that identifies a specific individual.
- **Information Collected by Clients.** A Client or User may store or upload into the Service Client Data. Sinimart has no direct relationship with the individuals whose Personal Data it hosts as part of Client Data. Each Client is responsible for providing notice to its customers and third persons concerning the purpose for which Client collects their

Personal Data and how this Personal Data is processed in or through the Service as part of Client Data.

- **“Automatically Collected” Information.** When a User or Visitor uses the Service, we may automatically record certain information from the User’s or Visitor’s device by using various types of technology, including cookies. This information may include IP address or other device address or ID, web browser and/or device type, the web pages or sites visited just before or just after using the Service, the pages or other content the User or Visitor views or interacts with on the Service, and the dates and times of the visit, access, or use of the Service. We also may use these technologies to collect information regarding a Visitor or User’s interaction with email messages, such as whether the Visitor or User opens, clicks on, or forwards a message. This information is gathered from all Users and Visitors.
- **Integrated Services.** You may be given the option to access or register for the Service through the use of your username and passwords for certain services provided by third parties (each, an “Integrated Service”), such as through the use of your Google account, or otherwise have the option to authorize an Integrated Service to provide Personal Data or other information to us. By authorizing us to connect with an Integrated Service, you authorize us to access and store your name, email address(es), date of birth, gender, current city, profile picture, URL, and other information that the Integrated Service makes available to us, and to use and disclose it in accordance with this Policy. You should check your privacy settings on each Integrated Service to understand what information that Integrated Service makes available to us, and make changes as appropriate. Please review each Integrated Service’s terms of use and privacy policies carefully before using their services and connecting to our Service.
- **Information from Other Sources.** We may obtain information, including Personal Data, from third parties and sources other than the Service, such as our partners, advertisers, credit rating agencies, and Integrated Services. If we combine or associate information from other sources with Personal Data that we collect through the Service, we will treat the combined information as Personal Data in accordance with this Policy.

How the information is used

We use the information that we collect in a variety of ways in providing the Service and operating our business, including the following:

- **Operations.** We use the information (except Client Data) to operate, maintain, enhance and provide all features of the Service, to provide the services and information that you request, to respond to comments and questions and to provide support to users of the Service.

- **Improvements.** We use the information (except Client Data) to understand and analyze the usage trends and preferences of our Visitors and Users, to improve the Service, and to develop new products, services, features, and functionality.
- **Communications.** We may use a Visitor's or User's email address or other information (except Client Data) to contact that Visitor or User (i) for administrative purposes such as customer service, to address intellectual property infringement, right of privacy violations or defamation issues related to the Client Data or Personal Data posted on the Service or (ii) with updates on promotions and events, relating to products and services offered by us and by third parties we work with. You have the ability to opt-out of receiving any promotional communications.
- **Cookies and Tracking Technologies.** We use automatically collected information and other information collected on the Service through cookies and similar technologies (web beacons, tracking technology and other automated tracking methods, etc) to: (i) personalise our Service, such as remembering a User's or Visitor's information so that the User or Visitor will not have to re-enter it during a visit or on subsequent visits; (ii) provide customised advertisements, content, and information; (iii) monitor and analyze the effectiveness of Service and third-party marketing activities; (iv) monitor aggregate site usage metrics such as total number of visitors and pages viewed; and (v) track your entries, submissions, and status in any promotions or other activities on the Service.
- **Analytics.** We use Google Analytics to measure and evaluate access to and traffic on the Public Area of the Site, and create user navigation reports for our Site administrators. Google operates independently from us and has its own privacy policy, which we strongly suggest you review. Google may use the information collected through Google Analytics to evaluate Users' and Visitors' activity on our Site. You may be able to opt out of customized ads by visiting the [Ads Preferences Manager](#), and the [Google Analytics Opt-out Browser Add-on](#). If you use our website without opting out, this means that you understand and agree to data collection for the purpose of providing you with remarketing ads.

To whom we disclose the information.

Except as described in this Policy, we will not intentionally disclose the Personal Data or Client Data that we collect or store on the Service to third parties without the consent of the applicable Visitor, User, or Client. We may disclose information to third parties if you consent to us doing so, as well as in the following circumstances:

- **Unrestricted Information.** Any information that you voluntarily choose to include in a Public Area of the Service, will be available to any Visitor or User who has access to that content.
- **Service Providers.** We work with third party service providers who provide website, application development, hosting, maintenance, and other services for us. These third parties may have access to, or process Personal Data or Client Data as part of providing those services for us. We limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions, and our contracts with them require them to maintain the confidentiality of such information.
- **Non-Personalised Information.** We may make certain automatically-collected, aggregated, or otherwise non-personally-identifiable information available to third parties for various purposes, including (i) compliance with various reporting obligations; (ii) for business or marketing purposes; or (iii) to assist such parties in understanding our Clients', Users' and Visitors' interests, habits, and usage patterns for certain programs, content, services, and/or functionality available through the Service.
- **Law Enforcement, Legal Process, and Compliance.** We may disclose Personal Data or other information if required to do so by law or in the good-faith belief that such action is necessary to comply with applicable laws, in response to a facially valid court order, judicial or other government subpoena or warrant, or to otherwise cooperate with law enforcement or other governmental agencies.
- **Sinimart rights and property protection.** We also reserve the right to disclose Personal Data or other information that we believe, in good faith, is appropriate or necessary to (i) take precautions against liability, (ii) protect ourselves or others from fraudulent, abusive, or unlawful uses or activity, (iii) investigate and defend ourselves against any third-party claims or allegations, (iv) protect the security or integrity of the Service and any facilities or equipment used to make the Service available, or (v) protect our property or other legal rights, enforce our contracts, or protect the rights, property, or safety of others.
- **Change of Ownership.** Information about Users and Visitors, including Personal Data, may be disclosed and otherwise transferred to an acquirer, successor, or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets and only if the recipient of the User or Visitor Data commits to a Privacy Policy that has terms substantially consistent with this Privacy Policy.

Client Data may be physically or electronically transferred to an acquirer, or successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar

transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets, for the sole purpose of continuing the operation of the Service, and only if the recipient of the Client Data commits to a Privacy Policy that has terms substantially consistent with this Privacy Policy.

Your Choices

We respect your privacy rights and provide you with reasonable access to the Personal Data that you may have provided through your use of the Services.

Access, Correction, Deletion

If you wish to access or amend any other Personal Data we hold about you, or to request that we delete any information about you that we have obtained from an Integrated Service, you may contact us as set forth in the “How to Contact Us” section. At your request, we will have any reference to you deleted or blocked in our database.

You may update, correct, or delete your Account information and preferences at any time by accessing Settings page on the Service. Please note that while any changes you make will be reflected in active user databases instantly or within a reasonable period of time, we may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so.

You may decline to share certain Personal Data with us, in which case we may not be able to provide to you some of the features and functionality of the Service.

At any time, you may object to the processing of your Personal Data, on legitimate grounds, except if otherwise permitted by applicable law.

This provision does not apply to Personal Data that is part of Client Data. In this case, the management of the Client Data is subject to the Client’s own Privacy Policy, and any request for access, correction or deletion should be made to the Client responsible for the uploading and storage of such data into the Service.

Navigation Information

You may opt out from the collection of navigation information about your visit to the Site by Google Analytics by using the [Google Analytics Opt-out feature](#).

Opting out from Commercial Communications

If you receive commercial emails from us, you may unsubscribe at any time by following the instructions contained within the email or by sending an email to us.

Even after you opt-out from receiving commercial messages from us, you will continue to receive administrative messages from us regarding the Service.

Sinimart has no direct relationship with the Client's customers or third party whose Personal Data it may process on behalf of a Client. An individual who seeks access, or who seeks to correct, amend, delete inaccurate data or withdraw consent for further contact should direct his or her query to the Client or User they deal with directly. If the Client requests Sinimart to remove the data, we will respond to its request within thirty (30) days. We will delete, amend, or block access to any Personal Data that we are storing only if we receive a written request to do so from the Client who is responsible for such Personal Data, unless we have a legal right to retain such Personal Data. We reserve the right to retain a copy of such data for archiving purposes, or to defend our rights in litigation. Any such request regarding Client Data should be addressed as indicated in the "How to Contact Us" section, and include sufficient information for Sinimart to identify the Client or its customer or third party and the information to delete or amend.

Third-Party Services

The Service may contain features or links to web sites and services provided by third parties. Any information you provide on third-party sites or services is provided directly to the operators of such services and is subject to those operators' policies, if any, governing privacy and security, even if accessed through the Service. We are not responsible for the content or privacy and security practices and policies of third-party sites or services to which links or access are provided through the Service. We encourage you to learn about third parties' privacy and security policies before providing them with information.

The Following Types of Cookies Are Used in the Site:

- **strictly necessary/essential cookies** – These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies services you have asked for cannot be provided. These cookies don't collect information that identifies a visitor.
- **performance cookies** – These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

- **functionality cookies** – These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports or traffic news by storing in a cookie the region in which you are currently located. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.
- **behaviourally targeted advertising cookies** – These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaigns. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

Children's privacy

Our Service is not directed to children under the age of 18, and we do not knowingly collect Personal Data from children under the age of 18 without obtaining parental consent. If you are under 18 years of age, then please do not use or access the Service at any time or in any manner. If we learn that Personal Data has been collected on the Service from persons under 18 years of age and without verifiable parental consent, then we will take the appropriate steps to delete this information. If you are a parent or guardian and discover that your child under 18 years of age has obtained an Account on the Service, then you may contact us and request that we delete that child's Personal Data from our systems.

Data security

We follow generally accepted industry standards to protect the information submitted to us, both during transmission and once we receive it. We maintain appropriate administrative, technical and physical safeguards to protect Personal Data against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing of the Personal Data in our possession. This includes, for example, firewalls, password protection and other access and authentication controls. We use SSL technology to encrypt data during transmission through public internet, and we also employ application-layer security features to further anonymize Personal Data.

However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. We cannot ensure or warrant the security of any information you transmit to us or store on the Service, and you do so at your own risk. We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. If you believe your Personal Data has been compromised, please contact us as set forth in the “How to Contact Us” section.

If we learn of a security systems breach, we will inform you of the occurrence of the breach in accordance with applicable law.

Data Retention

We only retain the Personal Data collected from a User for as long as the User’s account is active or otherwise for a limited period of time as long as we need it to fulfill the purposes for which we have initially collected it, unless otherwise required by law. We will retain and use information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements as follows:

- billing information is retained for a period of 7 years as of their provision to Sinimart in accordance with the Estonian accounting and taxation laws
- information on legal transactions between Client and Sinimart is retained for a period of 10 years as of their provision to Sinimart in accordance with the general claim expiry period under applicable Estonian laws

Privacy settings

Although we may allow you to adjust your privacy settings to limit access to certain Personal Data, please be aware that no security measures are perfect or impenetrable. We are not responsible for circumvention of any privacy settings or security measures on the Service. Additionally, we cannot control the actions of other users with whom you may choose to share your information. Further, even after information posted on the Service is removed, caching and archiving services may have saved that information, and other users or third parties may have copied or stored the information available on the Service. We cannot and do not guarantee that information you post on or transmit to the Service will not be viewed by unauthorized persons.

Data Controller and Data Processor

Sinimart does not own, control or direct the use of any of the Client Data stored or processed by a Client or User via the Service. Only the Client or Users are entitled to access, retrieve and direct the use of such Client Data. Sinimart is largely unaware of what Client Data is actually

being stored or made available by a Client or User to the Service and does not directly access such Client Data except as authorized by the Client, or as necessary to provide Services to the Client and its Users.

Because Sinimart does not collect or determine the use of any Personal Data contained in the Client Data and because it does not determine the purposes for which such Personal Data is collected, the means of collecting such Personal Data, or the uses of such Personal Data, Sinimart is not acting in the capacity of data controller in terms of the European Union's Directive 95/46/EC on data privacy or the European Data Protection Regulation ("EU Law") and does not have the associated responsibilities under EU Law.

Sinimart should be considered only as a processor on behalf of its Clients and Users as to any Client Data containing Personal Data that is subject to the requirements of EU Law. Except as provided in this Privacy Policy, Sinimart does not independently cause Client Data containing Personal Data stored in connection with the Services to be transferred or otherwise made available to third parties, except to third party subcontractors who may process such data on behalf of Sinimart in connection with Sinimart's provision of Services to Clients. Such actions are performed or authorized only by the applicable Client or User.

The Client or the User is the data controller under the Directive for any Client Data containing Personal Data, meaning that such party controls the manner such Personal Data is collected and used as well as the determination of the purposes and means of the processing of such Personal Data.

Sinimart is not responsible for the content of the Personal Data contained in the Client Data or other information stored on its servers (or its subcontractors' servers) at the discretion of the Client or User nor is Sinimart responsible for the manner in which the Client or User collects, handles disclosure, distributes or otherwise processes such information.

Changes and Updates to this Policy

Please revisit this page periodically to stay aware of any changes to this Policy, which we may update from time to time. If we modify the Policy, we will make it available through the Service, and indicate the date of the latest revision, and will comply with applicable law. Your continued use of the Service after the revised Policy has become effective indicates that you have read, understood and agreed to the current version of the Policy.

How to Contact Us

Please contact us with any questions or comments about this Policy, your Personal Data, our use and disclosure practices, or your consent choices by email info@sinimart.com (Re: ATT: Privacy Policy). T: +372 56 810 809