

## Privacy Policy

**Company (“we”, “our”):** Yenisei Holdings Ltd  
**Address:** Office 104, A. Constantinou 43, Nicosia 2024, Cyprus  
**Data Protection Officer:** dpo@yeniseimedia.com  
**Last updated:** 1/11/2022

We treat both your security and the security of your personal data very seriously. Our objective is to provide a safe, secure and private environment. We've therefore put this Privacy Policy together so you know how we treat and protect your data. Please read it in conjunction with our Terms and Conditions, as together they form the basis of our contract with, and commitment to you. If you do not accept its terms you should not use the website and/or the Services.

### 1. THE INFORMATION WE COLLECT

- 1.1 This Privacy Policy applies to all information, including the personal data (the “**Personal Data**”) within the meaning of the General Data Protection Regulation EU 2016/679 that we and/or our affiliates, including those in the same group with us, may obtain about you as a part of your use of any our developed websites, programs, products and/or Services that you may find on our website and others owned by us; as well as our affiliates perform any agreements and contracts entered into with you in connection with your use of the Services.
- 1.2 We may also receive Personal Data from affiliates, websites, programs, products or services that you use. In such cases, Personal Data may only be transferred when they are not in conflict with the law and are based on partnership agreements between us and each of the affiliates.
- 1.3 Please note that the use of any of the websites and/or Services may be subject to additional terms that may be amended and/or added to this Policy and/or have special terms relating to Personal Data.
- 1.4 The types of information that we collect fall under two general categories: personally identifiable information (PII) and non-personally identifiable information (non-PII). PII consists of any information which can be used to specifically identify you as an individual, whereas non-PII consists of aggregate information or any information that does not reveal your identity. The following subsections describe how your PII and non-PII are collected by us, and how we use such information:
  - (a) Log Files. Any time you visit any of our websites, our servers automatically gather information from your browser (such as your IP addresses, browser type, Internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks) to analyse trends, administer the site, prevent fraud, track visitor movement in the aggregate, and gather broad demographic information;
  - (b) Cookies. We use “cookies” to keep track of some types of information while you are visiting our website or using our Services. Cookies are very small files placed on your computer, and they allow us to count the number of visitors to our website and distinguish repeat visitors from new visitors. They also allow us to save user preferences and track user trends. We rely on cookies for the proper operation of our website; therefore if your browser is set to reject all cookies, the website will not function properly. Users who refuse cookies assume all responsibility for any resulting loss of functionality;
  - (c) Web Beacons. “Web beacons” (also known as “clear gifs” and “pixel tags”) are small transparent graphic images that are often used in conjunction with cookies in order to further personalize our website for our users and to collect a limited set of information about our visitors. We may also use web beacons in email communications in order to understand the behaviour of our customers;
  - (d) Mobile Analytics. We use mobile analytics software to allow us to better understand the functionality of our mobile software on your phone. This software may record information such as how often you use the application, the events that occur within the application, aggregated usage, performance data, and where the application was downloaded from;
  - (e) Information About You. When you register or subscribe to any of our Services, we collect a wide variety of information about you, including: your name, age, gender, address, bank details, sensitive information (with your explicit consent) and other information which you may provide interacting with the website or Service.
  - (f) Purchase History and Information. To process purchases, we may require your name, address, phone number, email address and credit card information. Such information is used primarily to process your order or as otherwise described herein. Credit card transactions are processed through industry standard Secure Socket Layer (SSL) and/or strong encryption (3DES) by a third party, which only uses your information for that purpose.

- (g) E-mails and Telephone Calls. We may require an e-mail address from you when you register for our Services. We use your e-mail for both transactional (e.g., order confirmation, refund and renewal processing, notifying of matches for our Singles service) and promotional (e.g., newsletters, new product offerings, special discounts, event notifications, special third-party offers) purposes. E-mail messages we send you may contain code that enables our database to track your usage of the e-mails, including whether the e-mail was opened and what links (if any) were clicked. If you would rather not receive promotional e-mails from us, please see the section below labelled "Choice/Opt-Out". We reserve the right to send you certain communications relating to our Services, such as service announcements and administrative messages, without offering you the opportunity to opt out of receiving them. We may also contact you by telephone or text message (including to any wireless number you may provide to us) solely in connection with our Services. If you would rather not receive telephone calls or text messages from us, you may change or delete your number from your account preferences page(s), or ask to be removed from our contact list if you receive a call or text message from us.
- (h) Mobile Device If you use a mobile device to access our site or download any of our applications, we may collect device information (such as your mobile device ID, model and manufacturer), operating system and version information, and IP address. We collect your geolocational information only upon your consent.
- (i) Demographic Data. Demographic data is also collected at our site. We use this data to tailor our visitors' experience at our site, showing them content that we think they might be interested in, and displaying the content according to their preferences.
- (j) Online Survey Data. We may periodically conduct voluntary member surveys. We encourage our members to participate in such surveys because they provide us with important information regarding the improvement of our services. You may also volunteer for certain surveys that we may offer to our users, and any additional rules regarding the conduct of such surveys will be disclosed to you prior to your participation. We do not link the survey responses to any PII, and all responses are anonymous.
- (k) Information Regarding Your Friends. We encourage you to refer a friend to our Service by sending us a friend's name and email address. We will keep this information in our database, and send that person a one-time e-mail containing your name and inviting them to visit our site. This e-mail will also include instructions on how to remove their information from our database. You agree that you will not abuse this feature by entering names and addresses of those who would not be interested in our Services. For some of our services, you may also give gift memberships to your friends, in which case we will use your friends' e-mail address that you provide in order to deliver the gift.

1.5 Our aims of Processing your Personal Data: granting access to the Sites and/or Services; granting access to account; sending notices, inquiries and information relating to the operation of the Sites and Services; advertising personalization; Improving usability of the Sites and Services, including for displaying more personalized websites and Services and improving other partner websites and Services; and collection, processing and provision of static data, large amounts of which are provided by Services.

1.6 The law allows us to collect and/or otherwise process your Personal Data only where we have a lawful reason to do so. We may therefore, process your Personal Data for the purposes described above for one or more lawful bases of processing, depending on the specific purpose for which we are using your data. The applicable lawful bases are the following: processing is necessary so as to decide whether to enter into a contract with you or for the performance of a contract to which you are a party (i.e. membership); to be compliant with applicable legal and regulatory requirements; to pursue our legitimate interests (or those of another third party), provided that these interests do not unfairly go against what is right and best for you (for instance, for marketing purposes, or identifying any fraud or other forms of misuse); when you provide your consent for a specific use of your Personal Data; in the event where the use of your Personal Data is based on your consent, such consent shall be freely given by you and you will have the right to withdraw your consent at any time by contacting us with the contact details set out in this Privacy Policy.

## 2. CONTROL AND DISCLOSURE OF YOUR PERSONAL DATA

2.1 You provide us with consent for the following disclosures of your Personal Data:

- (a) Disclosure By Law. You acknowledge and agree that we may disclose Personal Data you provide if required to do so by law, at the request of a third party, or if we, in our sole discretion, believe that disclosure is reasonable to (1) comply with the law, requests or orders from law enforcement, or any legal process (whether or not such disclosure is required by applicable law); (2) protect or defend our, or a third party's, rights or property; or (3) protect someone's health or safety, such as when harm or violence against any person (including you) is threatened;

- (b) Disclosure to Protect Abuse Victims. Notwithstanding any other provision of this privacy statement or our Terms and Conditions of Service, we reserve the right, but have no obligation, to disclose any information that you submit to the services, if in our sole opinion, we suspect or have reason to suspect, that the information involves a party who may be the victim of abuse in any form. Abuse may include, without limitation, elder abuse, child abuse, spousal abuse, neglect, or domestic violence. Information may be disclosed to authorities that we, in our sole discretion, deem appropriate to handle such disclosure. Appropriate authorities may include, without limitation, law enforcement agencies, child protection agencies, or court officials. You hereby acknowledge and agree that we are permitted to make such disclosure;
- (c) Disclosure to Trusted Third Parties By Us. We may share your non-PII with third parties, but not in a manner that would reveal your identity. We may share your PII, sometimes in conjunction with your non-PII, with service providers that may be associated with us to perform functions on our behalf. For example, outsourced customer care agents or technology assistants may need access to your information to perform services for you. Your information will be treated as private and confidential by such service providers and not used for any other purpose than we authorize. In addition, from time to time, we may share PII (such as e-mail or mailing address) about our user base with carefully selected third parties, so they can offer goods and services that we believe may be of interest to our users. If you do not wish to receive offers from our trusted partners, you can change your e-mail preferences at any time by following the steps outlined in the "Choice/Opt-Out" section below;
- (d) Disclosure to Trusted Third Parties at Your Request. We may provide you with advertisements, promotions and offers from third party providers. If you choose to accept any such offers, you may either (depending on the situation) directly provide your information in connection with the offer to such third party provider, or we will provide your information, including billing information, to the third party provider by pre-populating the offer registration forms. Your information will not be transferred until you actually accept the offer. You may opt-out of the offer at any time up until this point. Please refer to the third party provider's own privacy policy (provided on the offer pages) if you have any questions regarding how your information is used by such providers. Please be aware that these offers may be presented on pages framed by our website. We do this to provide a seamless experience. Although these offer pages have the look and feel of our websites, you will be submitting your information directly to the third-party advertiser. You agree that we will not be responsible or liable for any loss or damage of any sort incurred as the result of any such dealings, including the sharing of the information you supply to us with third party providers described here, or as the result of the presence of such providers on an our website;
- (e) Search Engine. Some portions of your profile may be available to search engine crawlers and therefore may appear in internet search results, but no PII (e.g., last name, photos) will be included in such search results; and
- (f) Information Transferred As a Result of Sale of Business. As we develop our business, we may buy or sell assets and, depending on the transaction, your PII may be one of the transferred assets. In the event that we are acquired by another company, your PII may be part of the assets transferred to the acquiring party. If this occurs, you will be notified if there are any material changes to the way your PII is collected or used.

### **3. LINKS TO EXTERNAL SITES AND/OR SERVICES**

- 3.1 Our Service may contain links to external sites that are not managed by us. If you click on a third party link, you will be redirected to that third-party's site. We strongly recommend you to read the privacy policy and terms of use each site that you visit.
- 3.2 We do not control and are not responsible for the content, privacy policy or practices of any third party site, product or service.

### **4. SECURITY**

The security of your Personal Data is important to us; however, remember that no method of transmitting information over the Internet and no electronic storage are 100% secure. Although we strive to use commercially acceptable methods to protect your Personal Data, we cannot guarantee its absolute security.

### **5. DATA RETENTION AND DELETION**

- 5.1 We will retain your Personal Data for as long as we reasonably require it for the purposes mentioned herein, for a maximum period of 3 years.
- 5.2 In determining our retention periods, we consider the requirements imposed by any applicable legislation and/or regulations, our contractual obligations towards you or for the establishment, exercise or defense of legal claims.

## 6. YOUR RIGHTS

6.1 You have your statutory rights and specifically:

- (a) Right of access – you have a right to request us to confirm whether we are processing your Personal Data and also to provide you with a copy of the Personal Data that we hold about you;
- (b) Right of rectification – you have a right to request from us to correct the Personal Data that we hold about you that is inaccurate or incomplete. We will update your Personal Data in accordance with your instructions (subject, where appropriate, to verification of the accuracy of the relevant data);
- (c) Deletion of Personal Data (Right to be forgotten) – you have a right to request from us in certain circumstances to erase your Personal Data from our records;
- (d) Right to restriction of processing – you have a right to request from us where certain conditions apply, to restrict the processing of your Personal Data. Such conditions include, without limitation, the case where the processing is unlawful, and you oppose the processing of the Personal Data and request the restriction of their use instead. However, such restriction will not stop us from storing your Personal Data;
- (e) Right of portability – you have a right to receive your Personal Data which you provided us in a structured, commonly used and machine-readable format and to transmit this elsewhere or ask us to transfer them to another data controller, to the extent applicable;
- (f) Right to object / Opt-Out – you have a right to object on grounds relating to your particular situation, to certain types of processing such as direct marketing or where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms;
- (g) Withdrawal of Consent - In cases where the processing of your Personal Data is based on your consent, you are entitled to withdraw such consent whenever. However, any withdrawal of consent shall not affect the lawfulness of processing based on consent, before it was withdrawn by you;

6.2 In general, it is acknowledged that the exercise of your above rights may be subject to certain restrictions, and therefore, there might be cases where we may be unable to fulfill your request. Moreover, once we receive a request to exercise any of your rights, we may request you to provide us with certain identification documents, in order to verify your identity. In addition, we shall respond to such request within 1 (one) month of receipt of the request, a period that may be extended by 2 (two) further months, where necessary, by taking into consideration the complexity and number of requests. However, under this exceptional event, we shall inform you of any such extension, within 1 (one) month of receipt of the request, together with the reasons for the delay.

## 7. POLICY CHANGES

7.1 Although most changes are likely to be minor, we may make changes to the Privacy Policy from time to time. However, in cases of any major amendments that affect, inter alia, our processing activities and/or the way you may exercise your data protection rights, we will bring these changes to your attention (e.g. by sending you an e-mail or drawing your attention upon next log-in).