Privacy Policy

The last update: September 9, 2021

This Privacy Policy (hereinafter referred to as the “**Policy**”) establishes the rules for processing of personal data of persons that are the Users of the website with the URL <http://webisida.com/> and the services provided by or through the website (hereinafter referred to as the “**Service**”). The Policy determines the list of personal data processed via the Service, the purposes of personal data processing, the ways of using the personal data, and the entities involved in the processing of personal data.

The Service is operated by **Awebo Ltd.**, the company incorporated in accordance with the laws of Hong Kong under the registration number 3057713 which has the registered address at Suite A, 19/F Two Chinachem Plaza, 68 Connaught RD Central, Hong Kong (hereinafter referred to as the “**Company**”, “**we**”, “**us**”, “**our**”). The Company is the Data Controller of User’s Personal Data.

The use of the Service is regulated by the Public offer of the Company available on the following web-page of the Service: <http://webisida.com/Home/Offer> (hereinafter referred to as the “**Agreement**”). The terms and definitions provided in the Agreement apply to this Policy unless the specific term or definition of the Agreement contradicts the specific term or definition of the Policy. The Policy applies to processing of Personal Data necessary for provision of the services of the Platform regulated by the Agreement. By accepting the Agreement in accordance with the rules prescribed in the Agreement, the User also provides the Company with the consent to processing of User’s Personal Data in accordance with this Policy.

By visiting the Service, the Data Subject provides the Company with the consent to processing of Data Subject’s Usage Data regardless of whether the Data Subject accepts the Agreement or not.

## Definitions

### Service

Service is the website with the URL <http://webisida.com/> operated by the Company and the services provided by or through the website.

### Personal Data

Personal Data means any information relating to a Data subject (User) by which the Data subject can be identified.

### Usage Data

Usage Data is Personal Data collected automatically either from the use of the Service, or from the Service infrastructure itself (for example, the duration of a page visit).

### Cookies

Cookies are small files stored on your device (computer or mobile device). The information about the User collected through Cookies is Usage Data.

### Data Controller

Data Controller means the natural or legal person that determines the purposes and means of the processing of personal data.

For the purpose of this Policy, the Company is the Data Controller of Personal Data.

### Data Processor

Data Processor means any natural or legal person that processes Personal Data on behalf of the Data Controller, including Service Providers. We may use the services of various Service Providers and other Data processors in order to process Personal Data more efficiently.

### Data Subject (or User)

Data Subject (User) is any natural person using our Service. The term “Data Subject (User)” applies to representatives of Service’s Users which are legal entities.

### Children

Children are natural persons who are under the legal age of their country of residence that allows them to provide the Company with the consent to processing of Personal Data in accordance with the Policy.

## Categories of Personal Data Processed

### Personal Data

In order to use the Service in accordance with the Agreement, the User shall provide us with the Personal Data by which the Company can identify the User as a real natural person.

In order to identify the User, the Company is entitled to process the following categories of User’s Personal Data:

* First name and last name
* Email address
* Phone number
* Home address (including ZIP)
* Payment information about the User (information about bank accounts or online wallets of the User)

Besides, if the User has the Account created in accordance with the Agreement, we are entitled to process the following categories of User’s Personal Data (in addition to Personal Data needed for identification of the User):

* Information about the funds available on the balance of the Account
* Information about transactions of the User (including credits and withdrawals made by the User)
* Information about communication of the User with other Users and with the Administration of the Company
* Information about the tasks of Advertisers taken or/and completed by the User
* Information about the use of the Platform by the User (including information about the services of the Platform used by the User)
* Information about the advertising materials posted by the User on or through the Service

If the User accepted the Agreement and uses the services of the Platform without the Account, the Company is entitled to process the following categories of User’s Personal Data (in addition to Personal Data needed for identification of the User):

* Information about communication of the User with other Users and with the Administration of the Company
* Information about the use of the Platform by the User (including information about the services of the Platform used by the User)
* Information about the advertising materials posted by the User on or through the Service

### Usage Data

Company processes Usage Data about all Data Subjects that visit the Service, regardless of whether the Data Subject accepts the Agreement and uses the services of the Platform. The processing of Usage Data starts when the Data Subject opens the Service on his browser.

Such Usage Data may include the following categories:

* Internet Protocol address (IP address)
* Browser type
* Browser version
* Country code
* The information about the pages of the Service that were visited by the Data Subject
* The time and date of the visit of the Service
* The time spent on the particular pages of the Service
* The unique device identifier of the Data Subject
* Other diagnostic data which relates to the use of the Service by the Data Subject

### Tracking & Cookies

We use Cookies and similar tracking technologies to track the activity on our Service. The information collected by use of Cookies and similar tracking technologies used by the Company is Usage Data which is processed by the Company regardless of whether the User accepts the Agreement. The processing of the Usage Data collected through Cookies or similar tracking technologies starts when the Data Subject opens the Service on his browser.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to the browser of the User from the Service and are stored on your device.

The User can instruct his browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if the User does not accept Cookies, he may not be able to use some portions of our Service.

Examples of Cookies we use:

* **Session Cookies**. We use Session Cookies to operate our Service.
* **Preference Cookies**. We use Preference Cookies to remember preferences and various settings of the Data Subject.

### Information of Users of traffic exchange application

Some Personal Data about Users may be processed while Users use the exchange of Internet-traffic application of the Company provided through the Platform under the Agreement (see Section VI of the Agreement). The following categories of Personal Data (in addition to other categories of Personal Data) on Users using the traffic exchange application may be processed:

* **Device information.** This includes IP address, operating system version, device model, last-seen timestamp, and location (city and country).
* **Network information.** This specifies whether User’s Wi-Fi is on or off.

In order to analyze and improve our Platform’s services related to exchange of Internet-traffic, we also process some aggregated statistics related to the use of our application. This may include crash and error reports.

## Purposes of processing Personal Data

The Company uses the processed Personal Data for the following purposes:

* To provide, improve, and maintain our Service
* To notify the User about changes to our Service
* To provide customer support to the User
* To communicate with the User and to resolve disputes with the User or between Users
* To gather analysis or valuable information about the use of the Service by the User so that we can improve our Service
* To analyze statistical information about the use of our Service
* To detect, prevent, and address technical issues
* To detect, prevent, and address fraud
* To provide the User with news (including newsletters), marketing materials, special offers, and general information about other goods, services and events which we offer that are similar to those that the User has already purchased or enquired about, unless the User has opted not to receive such information; the User may opt-out by using settings of his Account or by following the “unsubscribe” link which is included in each email we send to Users
* To carry out marketing activities (marketing purposes).

We do not share, sell, rent, or trade Personal Data with third parties for their commercial purposes.

## Storage of Personal Data

The Company will store Personal Data only for as long as is necessary for reaching the purposes of Personal Data processing set out in this Policy. We will also retain and use Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain Personal Data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also store Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obliged to store such data for longer periods.

## Transfer of Personal Data

Personal Data may be transferred to servers located outside of User’s state of residence where the data protection laws may differ from those of User’s jurisdiction.

The jurisdictions where the User’s Personal Data may be transferred to include the following:

* 1. Hong Kong
	2. The USA
	3. EU Member States
	4. The UK
	5. The Russian Federation

By providing the Company with the consent to processing of User’s Personal Data in accordance with the Policy, the User provides the Company with the explicit consent to transfer User’s Personal Data outside the jurisdiction of his residence despite the possible risks associated with the international Personal Data transfer. Such possible risks include the following:

1. The threat of hacking attacks by which third parties may try to get unauthorized access to Personal Data
2. The efforts of third parties to infect servers used for storage of Personal Data with malicious software
3. The differences between personal data laws of the User’s country of residence and personal data laws of the jurisdiction where Personal Data is stored

The Company will take all the steps necessary to ensure that Personal Data is treated securely and in accordance with this Policy. No transfer of Personal Data will take place to an organization or a country unless there are adequate controls in place which ensure security of Personal Data.

## Disclosure of Personal Data to third parties

### Legal Requirements

The Company may disclose Personal Data to a third party in the good faith belief that such action is necessary to:

* Comply with a legal obligation
* Protect and defend the rights or property of the Company
* Prevent or investigate possible wrongdoing in connection with the Service
* Protect the personal safety of Users of the Service or the public
* Protect against legal liability

## Security of Data

The security of Personal Data is important to us. The Company uses all the necessary methods and means for ensuring protection of Users’ Personal Data.

However, Users should remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect Personal Data, we cannot guarantee its absolute security.

## Personal Data protection rights

If the User is a resident of the European Economic Area (EEA), he has certain data protection rights provided by GDPR. The Company aims to take reasonable steps to allow the User to correct, amend, delete, or limit the use of his Personal Data.

If the User wishes to be informed about what User’s Personal Data we process, or if the User wants his Personal Data to be removed from our systems, or if the User wants to exercise other rights provided by GDPR, he is entitled to contact us for exercising his rights.

The User from EEA also has the right to complain to a data protection authority about our collection and use of User’s Personal Data. For more information, the User should contact his local data protection authority in the EEA.

All the Users (regardless of whether they are from EEA or not) have the following data protection rights:

* **The right to access**, update, or delete the information we have on the User. Whenever made possible, the User can access, update, or request deletion of his Personal Data directly within his Account settings section. If the User is unable to perform these actions by himself, he may contact the Company for assistance.
* **The right of rectification**. The User has the right to have his information rectified if that information is inaccurate or incomplete.
* **The right to object**. The User has the right to object to our processing of his Personal Data if there are legal grounds for objection provided by the applicable legislation.
* **The right of restriction**. The User has the right to request that we restrict the processing of his Personal Data if there are legal grounds for requesting restriction provided by the applicable legislation.
* **The right to data portability**. The User has the right to be provided with a copy of the Personal Data we have on him in a structured, machine-readable, and commonly used format. The User also has the right to port Personal Data presented in such a format to another data controller if there are legal grounds provided by GDPR or other applicable legislation.
* **The right to erasure.** The User has the right to erase his Personal Data (that is, to request the Company to delete his Personal Data).
* **The right to withdraw consent to processing**. The User has the right to withdraw his consent to processing of Personal Data at any time where the Company relied on User’s consent.

Please note that we may ask the User to verify his identity before responding to his requests. If the User refuses to verify his identity, the Company may deny the request of the User if it does not violate applicable legislation.

If the User objects to processing of Personal Data or restricts processing of Personal Data, or requests the Company to delete User’s Personal Data, or withdraws the consent to processing of Personal Data in accordance with the Policy, the Company has the right to partially restrict or fully refuse access to the Service if the use of the Service is impossible without processing of User’s Personal Data.

## Service Providers and other Processors

We may employ Service Providers and other Processors to process Personal Data of Users, to facilitate our Service, to provide the Service on our behalf, to perform Service-related services, or to assist us in analyzing how our Service is used.

The Processors involved in processing of Personal Data perform only specific tasks on the behalf of the Company and shall not disclose Personal Data to any third party if it is not expressly provided by the Policy.

Here are the categories of Processors involved by the Company in processing of Personal Data:

### Analytics

We may use Service Providers to monitor and analyze the use of our Service.

*Yandex.Metriсa*

Yandex.Metriсa is a web analytics service offered by Yandex LLC that tracks and reports website traffic. Yandex uses the data collected to track and monitor the use of our Service. This data is shared with other Yandex services. Yandex may use the collected data to contextualize and personalize the ads of its own advertising network.

The User can opt-out of having made his activity on the Service available to Yandex.Metriсa by installing the Yandex.Metriсa opt-out browser add-on. The add-on blocks storing cookie files on the user's computer and restricts data transmission to Yandex.Metrica.

For more information on the privacy practices of Yandex, please visit the [Yandex Privacy Policy](https://yandex.com/legal/confidential/) web page.

*Hotlog*

Hotlog is a web analytics service offered by PalitrumLab LLC that tracks and reports website traffic.

For more information on the privacy practices of PalitrumLab LLC, please visit the [Hotlog Terms of Service](https://hotlog.ru/static?tpl=offer#security) web page.

*Reformal*

Reformal is a web service for organizing feedback.

Their Privacy Policy can be viewed at <http://reformal.ru/pages/privacy>.

### Payments

We may provide paid products and/or services within the Service. In this case, we use Processors for payment processing.

We will not store or collect payment card details of Users. That information is provided directly to our Processors that use payment Personal Data in accordance with their privacy policies. Such Processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council which is a joint effort of brands like Visa, MasterCard, American Express, and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

The payment Processors we work with are:

*WebMoney*

Their Privacy Policy can be viewed at <https://www.wmtransfer.com/eng/information/statistic/security.shtml>.

*AdvCash*

Their Privacy Policy can be viewed at <https://advcash.com/confidential/>.

*Payeer*

Their Privacy Policy can be viewed at <https://payeer.com/ru/policy/>.

*Free Kassa*

Their Privacy Policy can be viewed at <https://www.free-kassa.ru/freeoferta.pdf>.

*FKWallet*

Their Privacy Policy can be viewed at <https://fkwallet.ru/files/offkwallet.pdf>.

## Links to other websites

Our Service may contain links to other websites that are not operated by us. If the User clicks a third party link, he will be directed to that third party website. We strongly advise Users to review the privacy policies of all third-party websites that they visit.

We have no control over and assume no responsibility for the content, privacy policies, or practices of any third party websites or services.

## Children's privacy

Our Service does not address anyone who belongs to the category of Children.

We do not knowingly process Personal Data of Children. If the Company has doubts in regards to the User on whether he belongs to the category of Children or not, the Company has the right to ask the User to provide the confirmation that he does not belong to the Children category. If the User does not provide such confirmation, the Company will not process Personal Data of the User and may restrict access to the Service if the use of the Service is impossible without processing of User’s Personal Data. If the User provides the confirmation which will show that he belongs to the Children category, the Company will require the User to provide the consent of User’s parent or guardian to processing of User’s Personal Data in accordance with the Policy. The Company will not process User’s Personal Data until the User provides the Company with the consent of his parent or guardian to processing of User’s Personal Data; in this case, the Company may also restrict access to the Service if the use of the Service is impossible without processing of User’s Personal Data.

If you are a parent or guardian and you are aware that your Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from Children without the consent of a parent or a guardian, we will take steps to remove such Personal Data from our servers.

## Changes to this Privacy Policy

We may update our Policy from time to time. We will notify Users of any changes by posting the new version of the Policy on the Service. Changes to the Policy are effective when they are posted on the Service.

If the new version of the Policy provides for substantial alteration of the provisions of the Policy, we will provide a prominent notice on our Service before the updated version of the Policy comes into force. What constitutes a substantial alteration of the Policy will be determined at our sole discretion.

Users are advised to review this Privacy Policy periodically for any changes.

## Contact Us

If the User has any questions about this Privacy Policy, he may contact our [Support](http://webisida.com/Home/Contacts).