

Privacy policy

When you visit our website (hereinafter “**Sites**”) or we have any communication or interaction with you, your personal data are collected and processed by TakeOff Technology OÜ (Estonian commercial registry code 14463092, hereinafter “**TakeOff**” or “**we**”). This Privacy Policy explains how we process your personal data.

We will not provide the personal information collected from the customers to 3rd party without the prior consent from the said customers otherwise required under the applicable laws. We process all data within the European Union and comply with applicable European Union and national laws on personal data protection and privacy. If you do not agree with our practices, please do not use our Site and the services offered therein (“**Services**”).

Application of this privacy policy

This privacy policy define basic principles of our practices, and will be applied for our all websites and any kind of interactions or communications we provide (Our Services). We may also have other service-specific privacy policy. In the event of any conflicts or inconsistencies between this policy and them, this policy will be ignored and service-specific policy will be applied.

Types of Information We Process

Personal Data: We collect personal data you provide to us when you sign up to our mailing list and/or create an account. The personal data we process may consist of: your full name, username, email address, your address, country of residence, age, virtual currency address, any other information on your identity document details of any requests or transactions you make through the Services, and communications you send to us or submit to the Site (“**Personal Data**”); If you use our premium services, you may need to enter a credit card, but the information necessary for payment is sent to the payment service third party to use. Information necessary for payment is not sent to our server nor stored.

Aggregate and Anonymous Data: Aggregate and anonymous data is information that does not identify you specifically, including data collected automatically when you visit our Sites ("**Non-Personal Data**"). This may include cookies, pixel tags, web beacons, browser analysis tools and web server logs. This also includes information from the devices you use to access our Sites or mobile platform, your operating system type or mobile device model, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone of your device. Our server logs may also record the IP addresses of the devices you use to interact with our Sites. We may also collect information about a website you were visiting before you came to our Sites and any website you visit after you leave our Sites, if this information is supplied to us by your browser. We may also use software tools written by Javascript to measure and collect session information, including page response times, download errors, and methods used to browse away from the page. Non-Personal Data also includes some data collected by location services.

The Purpose and Period of Processing Personal Data and Non-Personal Data

Based on our legitimate interests to pursue our business activities and our rights and obligations deriving from potential contracts concluded with you, your Personal Data will be used for the following purposes:

- a. for verification procedures pursuant to our legal obligations and/or internal policies;
- b. to manage our daily business needs such as Site administration, analytics (including to perform user analytics), fraud prevention, or compliance with applicable laws.
- c. to build, operate and improve our Sites and our Services;
- d. to provide our Services and improve respective customer support;
- e. to ship products, letters, or other things you requested
- f. to send you reminders, technical notices, updates, security alerts and support, and administrative messages;
- g. to communicate with you and to provide additional news and information

- about the Services and any other products and services we may offer. You can opt-out of receiving our emails by following the unsubscribe instructions included in each such email or by contacting us at support@takeoff.center;
- h. to provide personalized contents, informations, or services based on your action when you opt in.

Any Non-Personal Data that we may gather that will not relate to you as an individual data subject (e.g. the times you view or use our Services) may be used for analytical and/or statistical purposes.

Any Non-Personal Data and anonymized Personal Data will be used for improving our services and/or modules such as AI improvement, machine learning, data analytics for marketing.

Limited Disclosure of Personal Data and Non-Personal Data

Except as provided herein, we will not display on our Sites, or otherwise disclose your Personal Data to any third parties unless it is necessary to provide the Services offered on the Site, when required by law, or if we have good faith belief that such action is reasonably necessary to

- a. comply with current judicial proceedings, a court order or legal process served on us;
- b. protect and defend our rights, property and interests, including by enforcing our agreements, policies or other such documents;
- c. respond to claims that any submitted content violates the rights of third parties;
- d. respond to your requests for customer service;
- e. protect the rights, property or personal safety of TakeOff, its members and the public;
- f. in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company, or with your consent to share the information.

If you have created an account at the Site, some information about you will be publicly available, such as:

- a. your account name;
- b. any information you choose to add to your public profile (such as a picture, bio, your location, tagged items);

We may share Non-Personal Data with analytics companies to learn information about how our users interact with the Site. This enables us to optimize the Services and improve our efforts.

We will never sell your Personal Data or Non-Personal Data.

Retention, Rectification and Deletion of the Data

We will retain your information only for as long as needed to provide you the Services or as long as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

You can modify and rectify the Personal Data you have provided to us by logging in and updating your profile. If you wish to delete the Personal Data collected by us or submit any other request concerning your personal data (e.g. requests regarding data portability, restrictions or objecting to the processing), you can do so by submitting a written request to our customer support via support@takeoff.center. You should keep in mind that the request to delete Personal Data is possible only if your account is deleted. If we delete your account, you will not be able to use our Services and will lose benefits connected to your existing account.

After receiving the request, we will delete your account and any Personal Data associated with the account if there are no assets or liabilities associated with the account. After the deletion the personal data will be permanently anonymized and used for analytics only.

Security of Personal Data

All Personal Data we collect is stored in the data centres located in the European Union. Only our authorised employees have access to the personal data whereas they may access the data only for the purposes stipulated in this Privacy Policy.

We employ generally accepted industry standards to protect the Personal Data and we continuously strive to protect your information and privacy as much as we can. We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration.

Your data will be saved on Amazon's AWS European servers that comply with the ISO/IEC 27001 standard. The information will be encrypted with the public-private key pair-based encryption on the user's computer and directly uploaded to our servers in encrypted form and stored on database encrypted. We will securely hold the decryption key and will be able to decrypt the information if requested from us by the authorities.

No data transmission over Wi-Fi , mobile communication, or the Internet or any processing of data via connected digital means can be 100% secure. Thus, we cannot guarantee or warrant the security of any information you disclose or transmit to us online.

Non-compliance with the Privacy Policy

If you feel that we are not keeping our promises made in this Privacy Policy, or breach other statutory or contractual obligations pertaining to the data processing, you may contact us via support@takeoff.center and

- a. ask us for an explanation;
- b. require us to remedy the arisen state of affairs (in particular by blocking, correction or supplementing of personal data);
- c. appeal directly to the respective data protection authority having the jurisdiction over your personal data (the Estonian Data Protection

Inspectorate).

Use of Cookies

TakeOff uses the information collected from cookies to evaluate the effectiveness of our Sites, analyse trends and administer our Sites, and to identify each individuals in cooperation with stored data in server to provide functions based on their user informations or contracts.

This Privacy Policy only addresses the use and disclosure of information by TakeOff. The “third party” cookies may be placed on your browser via the Site for analytical and advertising purposes, but we do not have any control over how the information is collected and used by these third parties. These “third party” cookies may be subject to privacy policies or terms and conditions imposed by these third parties and this Privacy Policy does not apply to, and we are not responsible for, the “third party” cookies or the processing of data the collected through them.

By using our Sites, you are agreeing that we may use cookies for the purposes set in this Privacy Policy. The standard browsing software allows placement of cookies on the terminal equipment. These settings can be modified to block the automatic handling of the cookies in the browser or to send a notification every time the cookies are about to be sent to the user’s device. Detailed information about the possibilities and the usage of the cookies is available in the software settings (browser). Restrictions in the use of the cookies may affect some of the functionality available on our Sites.

Modifications

We may occasionally modify the Privacy Policy. All changes will be effective upon posting on the Site. We will inform you about the changes as appropriate. You agree to be bound by any such changes if you continue to use the Site after such changes have been posted. We may change, restrict access to, suspend or discontinue our Sites or our Services, or any portion thereof, at any time.

Questions about Our Privacy Policy

If you have any questions or concerns regarding this Privacy Policy, you may contact us by e-mail at support@takeoff.center