

# Privacy Policy

**Voipscan Limited** (referred to as „we“, „us“, „our“, „Voipscan Limited“) is committed to protecting your privacy and handling your data in an open and transparent manner. The personal data that we collect and process depends on the product or service requested and agreed in each case.

This privacy statement:

- provides an overview of how the Voipscan Limited collects and processes your personal data and tells you about your rights under the local data protection law and the EU General Data Protection Regulation („GDPR“),
- is directed to natural persons who are either current or potential customers of the Voipscan Limited, or are authorised representatives/agents or beneficial owners of legal entities or of natural persons which/who are current or potential customers of the Voipscan Limited,
- is directed to natural persons who had such a business relationship with the Voipscan Limited in the past,
- contains information about when we share your personal data with other members of the Voipscan Limited Group and other third parties (for example, our service providers or suppliers).

In this privacy statement, your data is sometimes called “personal data” or “personal information”. We may also sometimes collectively refer to handling, collecting, protecting and storing your personal data or any such action as “processing” such personal data.

For the purposes of this statement, personal data shall mean any information relating to you which identifies or may identify you and which includes, for example, your name, address, identification number.

## 1. Who we are.

Voipscan Limited is a licensed voip telecommunication company registered in Cyprus under registration number HE 354242 as a limited liability company having its registered office at PATRON 10, 6051, LARNACA, CYPRUS.

If you have any questions, or want more details about how we use your personal information, you can contact our Data Protection Officer at email: [info@privacyminders.com](mailto:info@privacyminders.com), [www.privacyminders.com](http://www.privacyminders.com) or contact us [info@voipscan.eu](mailto:info@voipscan.eu)

## **2. Voipscan Limited and affiliated company.**

Voipscan Limited is a majority shareholder of Russian licensed telecommunication company a Limited liability company “Zvoni domoy” with registration number 1157746452324, VAT 7731283131 having its registered office at 121087, Russian Federation, Moscow, Bagrationovskiy proezd 7, bld. 20B, office 623. The share of Voipscan Limited of ownership of the LLC “Zvoni domoy” is 84% (eighty-four) percent. Each entity has its own separate privacy statement. Such entities maintain their own websites that may be linked to our website. If you are interested in learning about how such entities process your personal data, please refer to their corresponding privacy statements which may be found on their particular websites.

## **3. Information we collect about you.**

When you use our Services, we may collect the following information, including without limitation:

- Personal and contact information – e.g. name, billing, email address, (mobile) phone number, etc.
- Historical information – e.g. your purchase, payment and credit acceptance history
- Information about interaction between you and Voipscan Ltd. – e.g. how you use our Services, including page response times, download errors, entry and exit methods, as well as delivery notices when we contact you.
- Device information – e.g. the IP address, language settings, browser settings, time zone settings, operating system and platform and screen resolution.
- Geographical information – e.g. your geographical location.

## **4. Children’s data secure.**

We understand the importance of protecting children's privacy. We may collect personal data in relation to children only provided that we have first obtained their parents’ or legal guardian’s consent or unless otherwise permitted under law. We do not provide any online services to children but we may allow children, with their parents’ or legal guardian’s consent, to become subscribers of Voipscan Limited or LLC “Zvoni domoy” and its mobile application. For the purposes of this privacy statement, “children” are individuals who are under the age of sixteen (16).

## **5. Collecting, protection and disclosure of personal data.**

5.1. Voipscan Ltd. processes Personal Data and other data that (1) is provided to us personally by Data Subjects whom it concerns; or (2) is provided to us by our Clients and pertains to their own clients; or (3) pertains to performed payments and is provided to us by payment processors, e.g. credit card processors; or (4) is automatically generated or collected in the course of provision of Securax's Products and Services (e.g. the data included in license certificates and used for license authorization purposes, crash reports data, etc.).

5.2. When we ask you to provide us with any piece of your Personal Data you are not obliged to provide it to us. However, we need the Personal Data in order to be able to conclude a contract with you and provide you with our Products and/or Services. That is why, if you decide not to provide some or all of the requested Personal Data, we may not be able to provide you with some or all of our Products and/or Services. We will also not be able to provide you with our Products and Services if we do not process the Personal Data and other data that has been generated or received automatically in the course of provision of the Products and/or Services, including technical data such as Authorization Data, Website Usage Data and Crash reports and Support data.

5.3. We process Personal Data only for as long as this is necessary for the purposes outlined above. For example, we store Authorization Data for as long as the Client account is active and the End-User(s) can use the respective Products and Services, and we store Billing data at least 10 years due to legislation requirements. We process Personal Data via our own or leased technical means. Access to the premises and equipment where Personal Data are stored, and access to the Personal Data, are strictly controlled. Such access is provided only on a need-to-know basis and only to personnel and experts bound by rules of conduct and confidentiality obligations.

5.4. In some cases we may allow third parties to access Personal Data for the purpose of their providing to us services we need in order to provide and/or ensure the quality of our own Products and/or Services, e.g. services for extracting, analyzing and creating statistics based on Crash reports and Support data. In such cases Personal Data will be accessed only to the extent to which it

is necessary and only for the purpose of our receiving the respective third-party services.

5.5. By accepting this Privacy Policy you agree that we can provide some of your Personal Data to third parties for the purpose of facilitating and mediating your subscription to and usage of their services. This will only be done after your statement or action notifying us that you would like to receive services by those parties, for example when you click an option in our Product by which you choose to use the services of a particular VoIP or other service provider enabling the use of the Product.

5.6. We are obliged to disclose Personal Data when this is requested by competent authorities in cases provided in the applicable legislation. Examples of such cases may include on-going criminal investigations, tax investigations, market investigations by competition protection authorities, etc.

## **6. Whether you have an obligation to provide us with your personal data.**

In order that we may be in a position to proceed with a business relationship with you, you must provide your personal data to us which are necessary for the required commencement and execution of a business relationship and the performance of our contractual obligations before we enter into a contract or a business relationship with you or the legal entity for which you are the authorized representative / agent or beneficial owner. You must, therefore, provide us at least with your full name, number of your mobile telephon/smartphone, email address so that we may comply with our statutory obligation as mentioned above.

Kindly note that if you do not provide us with the required data, then we will not be allowed to commence or continue our business relationship either to you as an individual or as the authorized representative/agent or beneficial owner of a legal entity.

## **7. Why we process your personal data and on what legal basis**

As mentioned earlier we are committed to protecting your privacy and handling your data in an open and transparent manner and as such we process your

personal data in accordance with the GDPR and the local data protection law for one or more of the following reasons:

A. For the performance of a contract

We process personal data in order to perform our service and transactions based on contracts with our customer but also to be able to complete our acceptance procedure so as to enter into a contract with prospective customers.

The purpose of processing personal data depends on the requirements for each product or service and the contract terms and conditions provide more details of the relevant purposes.

B. For compliance with a legal obligation

There are a number of legal obligations emanating from the relevant laws to which we are subject as well as statutory requirements, e.g. the Cyprus Voipscan Limiteding law, the Money Laundering Law, Tax laws.

C. For the purposes of safeguarding legitimate interests

We process personal data so as to safeguard the legitimate interests pursued by us or by a third party. A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. Examples of such processing activities include:

- Initiating legal claims and preparing our defence in litigation procedures,
- Means and processes we undertake to provide for the Voipscan Limited"s IT and system security, preventing potential crime, asset security, admittance controls and anti-trespassing measures,
- Measures to manage business and for further developing products and services.
- Sharing your personal data within the Voipscan Limited for the purpose of updating/verifying your personal data in accordance with the GDPR.
- Voipscan Limited risk management,
- The transfer, assignment (whether outright or as security for obligations) and/or sale to one or more persons of and/or charge and/or encumbrance over, any or all of the Voipscan Limited"s benefits, rights, title or interest under any agreement between the customer and the Voipscan Limited.

D. You have provided your consent

Provided that you have given us your specific consent for processing (other than for the reasons set out hereinabove) then the lawfulness of such processing is based on that consent. You have the right to revoke consent at any time.

However, any processing of personal data prior to the receipt of your revocation will not be affected.

## **8. Who receives your personal data.**

In the course of the performance of our contractual and statutory obligations your personal data may be provided to various departments within the Voipscan Limited but also to LLC "Zvoni domoy". Various service providers and suppliers may also receive your personal data so that we may perform our obligations. Such service providers and suppliers enter into contractual agreements with the Voipscan Limited by which they observe confidentiality and data protection according to the data protection law and GDPR.

It must be noted that we may disclose data about you for any of the reasons set out hereinabove, or if we are legally required to do so, or if we are authorized under our contractual and statutory obligations or if you have given your consent. All data processors appointed by us to process personal data on our behalf are bound by contract to comply with the GDPR provisions.

Under the circumstances referred to above, recipients of personal data may be, for example:

- Supervisory and other regulatory and public authorities, inasmuch as a statutory obligation exists.
- External legal consultants,
- Financial and business advisors,
- Auditors and accountants,
- Marketing companies and market research companies,
- Card payment processing companies,
- File storage companies, archiving and/or records management companies, cloud storage companies.

## **9. Transfer of your personal data to a third country or to an international organization.**

Your personal data may be transferred to third countries [i.e. countries outside of the European Economic Area] in such cases as e.g. to execute your calls or credit the balance of your account in Voipscan Limited system or if this data transfer is required by law [e.g. reporting obligation under Tax law] or you have given us your consent to do so. Processors in third countries are obligated to comply with the European data protection standards and to provide appropriate

safeguards in relation to the transfer of your data in accordance with GDPR Article 46.

**For marketing purposes, your personal data may be shared with third parties for their own direct marketing. If you do not agree with this term, please stop using this service.**

## **10. To what extent there is automated decision-making and whether profiling takes place.**

In establishing and carrying out a business relationship, we generally do not use any automated decision-making. We may process some of your data automatically, with the goal of assessing certain personal aspects (profiling), in order to enter into or perform a contract with you.

## **11. How we treat your personal data for marketing activities and whether profiling is used for such activities.**

We may process your personal data to tell you about products, services and offers that may be of interest to you or your business.

The personal data that we process for this purpose consists of information you provide to us and data we collect and/or infer when you use our services. We study all such information to form a view on what we think you may need or what may interest you. In some cases, profiling is used, i.e. we process your data automatically with the aim of evaluating certain personal aspects in order to provide you with targeted marketing information on products.

We can only use your personal data to promote our products and services to you if we have your explicit consent to do so or, in certain cases, if we consider that it is in our legitimate interest to do so.

You have the right to object at any time to the processing of your personal data for marketing purposes, which includes profiling, by contacting at any time to Voipscan Limited in person or in writing.

## **12. How long we keep your personal information for.**

We will keep your personal data for as long as we have a business relationship with you [as an individual or in respect of our dealings with a legal entity you are authorized to represent or are beneficial owner].

Once our business relationship with you has ended, we may keep your data for up to ten (10) years in accordance with the directive of the Data Protection Commissioner (<http://www.dataprotection.gov.cy>).

We may keep your data for longer than 10 years if we cannot delete it for legal, regulatory or technical reasons.

For prospective customer personal data [or authorized representatives/agents or beneficial owners of a legal entity prospective customer] we shall keep your personal data for 6 months from the date of notification of the rejection of your application for Voipscan Limited services and/or facilities or from the date of withdrawal of such application, as per Data Protection Commissioner directive (<http://www.dataprotection.gov.cy>).

## **13. Your data protection rights.**

You have the following rights in terms of your personal data we hold about you:

- Receive access to your personal data. This enables you to e.g. receive a copy of the personal data we hold about you and to check that we are lawfully processing it. In order to receive such a copy you can complete our web form through the Voipscan Limited's website ([http://www.voipscan.eu/contact\\_us/](http://www.voipscan.eu/contact_us/)).
- Request correction [rectification] of the personal data we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to erase your personal data [known as the „right to be forgotten“] where there is no good reason for us continuing to process it.
- Object to processing of your personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. If you lodge an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms.

You also have the right to object where we are processing your personal data, for direct marketing purposes. This also includes profiling inasmuch as it is related to



direct marketing. If you object to processing for direct marketing purposes, then we shall stop the processing of your personal data for such purposes.

- Request the restriction of processing of your personal data. This enables you to ask us to restrict the processing of your personal data, i.e. use it only for certain things, if:
  - it is not accurate,
  - it has been used unlawfully but you do not wish for us to delete it,
  - it is not relevant any more, but you want us to keep it for use in possible legal claims,
  - you have already asked us to stop using your personal data but you are waiting us to confirm if we have legitimate grounds to use your data.
- Request to receive a copy of the personal data concerning you in a format that is structured and commonly used and transmit such data to other organisations. You also have the right to have your personal data transmitted directly by ourselves to other organisations you will name [known as the right to data portability].
- Withdraw the consent that you gave us with regard to the processing of your personal data at any time. Note that any withdrawal of consent shall not affect the lawfulness of processing based on consent before it was withdrawn or revoked by you.

To exercise any of your rights, or if you have any other questions about our use of your personal data, please contact to Voipscan Limited via email: [info@voipscan.eu](mailto:info@voipscan.eu).

You can also contact our Data Protection Officer at email: [info@privacyminders.com](mailto:info@privacyminders.com), [www.privacyminders.com](http://www.privacyminders.com) or contact us [info@voipscan.eu](mailto:info@voipscan.eu)

We endeavour to address all of your requests promptly.

Right to lodge a complaint

If you have exercised any or all of your data protection rights and still feel that your concerns about how we use your personal data have not been adequately addressed by us, you have the right to complain by email: [info@voipscan.eu](mailto:info@voipscan.eu) You also have the right to complain to the Office of the Commissioner for Personal Data Protection. Find out on their website how to submit a complaint (<http://www.dataprotection.gov.cy>).

## **14. Changes to this privacy statement.**

We may modify or amend this privacy statement from time to time.

We will notify you appropriately when we make changes to this privacy statement and we will amend the revision date at the top of this page. We do however encourage you to review this statement periodically so as to be always informed about how we are processing and protecting your personal information.

## **15. FAQ.**

To help you understand the basic principles of data privacy law and address some of the common questions that arise with regard to the protection of your personal data, please refer to the Frequently Asked Questions.

## **16. Cookies**

16.1 We use cookies on our Website for the purposes of providing and enhancing of our Services, in particular to remember your log-in details and enable you to use the Website, and to keep track of the sessions on the Website and the references from other websites that our Website received.

To find out more about how we use cookies please see our [cookie policy](#).

16.2. The cookies we use do not contain Personal Data, but only Anonymous Information.

16.3. You can manage the use of cookies on our Website at any time by changing the respective properties of your internet browser. You can find detailed information on the particular options available in your browser in its documentation.

16.4. As we use the cookies in order to allow us to provide high quality Services via our Website, disabling some or all of them may lead to impairing the quality of the Services or to inability for their provision.

Note:

The General Data Protection Regulation (EU) 2016/679 shall apply from 25 May 2018. Until then, the Processing of Personal Data (Protection of Individuals) Laws 2001 till 2012 remain in force.