

PRIVACY POLICY

I. GENERAL PROVISIONS

This Privacy Policy governs collection, processing, storing and use of your personally identifiable information and other personal data required for using and/or related to your use of the **eLama System** available via the website <https://elama.global> (the "System"), which is provided, maintained and operated by **ELAMA INTERNATIONAL PLATFORM LIMITED**, a company incorporated and existing under the laws of the Republic of Ireland under registration number: 571822, registered at **Inniscarra, Main Street, Rathcoole, Co. Dublin** (the "Operator"), which is a controller of your personal data.

This Privacy Policy is a legally binding agreement between the Internet user accessing and using the System and accepting this Privacy Policy ("You" or "User") and the Operator governing collection, processing, storing and use of your personally identifiable information and other personal data required for you using and/or related to your use of the System.

Please read and review this Privacy Policy before submitting any personal data to or with help of the System, or otherwise accessing or using the System. By submitting any personal data to or with help of the System, or otherwise accessing or using the System, you acknowledge that you have read, understand and agree to be legally bound by this Privacy Policy without limitation or qualification.

If you do not agree to the terms of collection, processing, storing and use of your personally identifiable information and other personal data set forth in this Privacy Policy, you may not submit any personal data to or with help of the System, or otherwise access or use the System in any way.

II. COLLECTION AND USE OF PERSONAL DATA

In certain instances of using the System discussed below, you will be prompted by the System to provide information about you that may identify you (your "Personal Data"). Personal Data submitted by you through and with help of the System and collected from you via the System may include the following information:

- your full legal name;
- your date of birth;
- your place of residence;
- your address of registration (legal address) in certain jurisdictions;
- your postal address and post code;
- your valid e-mail address;
- your credit or debit card details (only when specifically prompted by the System in relation to transactions);
- your home phone and/or mobile phone number; and
- other information from which an individual may be personally identified that may be required by the Operator and prompted for submitting from time to time via the System.

You agree that the Operator may collect your Personal Data in certain instances, such as, but not limited to:

- when you register your account on the System;
- when you use the System in accordance with its designated purpose;
- when you initiate transactions via the System, including transactions involving purchasing of services and special offers;
- when you contact the Operator by e-mail or phone;

- when you subscribe to the newsletter of the System;
- when you fill out the feedback form;
- when you otherwise use the services and functionality of the System.

You agree that all Personal Data you provide on this System must and will be correct, truthful, current, and complete. Providing misleading information about your identity is forbidden. If the Operator believes that the Personal Data you provide is not correct, current, or complete, or is false or misleading, the Operator has the right to refuse, suspend or terminate your access to the System or any of its resources and to suspend or terminate your account at any time.

You hereby understand and agree that if you do not want the Operator and/or its designated personal data processing contractor (if and in cases where applicable) to collect, process, store and/or use any of your Personal Data, you may not or will not be able to use certain functionality of the System, participate in transactions that may be offered on the System, or use those sections or modules of the System that require or may require your Personal Data for their performance, normal work or due provision of the System to you in accordance with its designated purpose.

The all Personal Data that the Operator collect from you is stored within the territory of European Union.

III. PERSONAL DATA OF CHILDREN AND TEENS

The System is intended for use by adults only. The Operator and its designated personal data processing contractor do not knowingly collect, use, maintain or disclose Personal Data of children younger than 13 years of age and teens aged between 13 and 18 years of age.

To use the System and submit your Personal Data, you must be both (1) at least 18 (eighteen) years of age, and (2) of legal age in the jurisdiction from which you access and use the System. If you are not 18 years of age, you may not access and use the System, and may not submit any Personal Data via the System. The Operator reserves the right to report attempts of use of the System by the minors to the appropriate authorities.

If the Operator has learned or has sufficient grounds to believe that Personal Data is submitted by a child or a teen instead of an adult, the Operator reserves the right to suspend the user account through which the Personal Data was submitted and request provision of an e-mail address of the parent or legal guardian of the submitting person so that the Operator can notify the parent or legal guardian that their child or teen has provided Personal Data through the System and provide an opportunity for the parent or legal guardian to request the deletion of that Personal Data from the relevant records. The Operator will contact the parent or legal guardian at the e-mail address provided and the parent or legal guardian will have 48 hours from delivery of the e-mail to advise if they do not agree to their child's or teen's provision of Personal Data. If the parent or legal guardian fails to reply to the query sent to the provided e-mail address, the Operator will assume that the parent has not consented to collection and processing of their child's or teen's Personal Data, after which the related user account will be immediately terminated and the Personal Data in question will be purged from Operator's records.

IV. PRINCIPLES OF PERSONAL DATA PROCESSING

The Operator collect, process, store and use your Personal Data in accordance with the following general principles:

- your Personal Data is or will be at all times obtained solely from you and from you only, and not from any third party;
- your Personal Data will be at all times collected, processed, stored and used lawfully;

- your Personal Data is collected, processed, stored and used only in accordance with the purposes of personal data processing outlined in this Privacy Policy and your express consents granted under this Privacy Policy;
- your Personal Data is at all times collected, processed, stored and used separately from non-personal data that may be received from you in accordance with this Privacy Policy; your Personal Data is at all times treated confidentially and processed, if and where applicable, only by or with assistance of personnel working with Personal Data that have signed non-disclosure agreements;
- your Personal Data will not be disclosed to any third party without your express written consent to such disclosure, with the exception of circumstances where such disclosure may be required by government authorities, such as courts or law enforcement agencies, or under law, as discussed further in this Privacy Policy;
- your Personal Data is processed, stored and used only for the period set forth in this Privacy Policy;
- processing of your Personal Data by third parties, such as the Operator's designated personal data processing contractor(s) (if and where applicable) will at all times be processed with the same level of confidentiality, data security and in strict accordance with the strict principles and purposes outlined in this Privacy Policy;
- the scope of collected Personal Data does not and will not be excessive with respect to the scope of purposes for which the Personal Data is collected, stored and used;
- and your Personal Data may be changed or deleted at any time in accordance with this Privacy Policy.

The Operator do not collect, process, store and use your sensitive personal data and any special categories of personal data.

V. PURPOSES OF PERSONAL DATA PROCESSING

The Operator collect, process, store and use your Personal Data solely for the following purposes:

- registering you as a valid and eligible user of the System, its functionality and built-in services;
- identification of the party to conclude a contract for the provision of services available in the System and processing orders;
- sending you promotional and advertising materials relating to new functionality and/or products of the System, as well as products and services of the Operator, as well as sending you other information that you requested or agreed to receive, including in the process of using the System;
- performing statistical studies based on the Personal Data provided by you and using information obtained from user surveys completed by you for improvement and enhancement of your user experience with respect to the System, its functionality and products;
- monitoring and maintaining the user/Operator relationship; completing financial transactions between you, the Operator;
- if and where applicable, offering you for purchasing and selling you specific functionality and services available on the System, such as special offers, billing you for these purchases, providing the purchased functionality and services to you, and maintaining records of such purchases and provision of functionality and services to you;

- sending notifications (system notifications) about the System and using the System by the registered User (including change of password, confirmation of important actions in the System, change of account data, etc.);
- for marketing and educational mailouts;
- sending SMS notifications on issues related to the use of the System;
- calls from the Operator's staff (such as but not limited to: calls from managers, technical support specialists, system consultants) related to the use of the System by registered Users.

The Operator may use your e-mail address for sending you notifications and other informational and promotional materials about functionality and services available on the System or other services and products, and the System may display online advertisements. You hereby grant your express consent to receive such informational and advertising materials. Your e-mail address will not be used for sending you unsolicited advertising messages ("spam").

The Operator may, from time to time, conduct customer surveys with voluntary participation required to improve and enhance your user experience with the System. You hereby grant your express consent to receive offers of participating in such surveys. If and to the extent you participate in such surveys, you grant your express consent to processing of your Personal Data that you may submit when completing such surveys.

The user can refuse to receive, both from the entire System newsletter mailing and phone calls, and from each one individually. Refusal to receive the information distribution of the System and phone calls of the System may be carried out in the personal account of the registered User or by sending an e-mail to the following address: invite@elama.global

Taking into account that the receipt of system notifications is a necessary condition for using the System, the refusal to receive system notifications is possible only upon deleting the account on the System of the registered User.

VI. YOUR CONSENT TO PROCESSING AND DISCLOSURE

You hereby acknowledge and agree that you grant the Operator, its affiliates, subsidiaries, controlling and controlled companies and designees your consent granted herein with respect to collection, processing, storing and use of your Personal Data by yourself, voluntarily and by your free will, in your own interests and consciously.

You hereby expressly consent to the collection, processing, storing and use of your Personal Data by the Operator by all means and for all purposes outlined in this Privacy Policy and under applicable law, including, but not limited to, this Section of the Privacy Policy, and disclosure of your Personal Data in accordance with the Privacy Policy.

In certain instances, your Personal Data may be processed by Operator to fulfill your payments made via the System. You hereby grant your express consent to the Operator to process any Personal Data that may be collected from you during such transactions, and share your Personal Data with third parties such as payment services providers and banks in order for them to be able to fulfill your payment requests.

VII. PERSONAL DATA PROTECTION RIGHTS

The Operator would like to make sure you are fully aware of all of your Personal Data protection rights, and You is entitled to the following:

- **The right to access** – You have the right to request for copies of your Personal Data.

- **The right to rectification** – You have the right to request that correct any information you believe is inaccurate. You also have the right to request to complete the information you believe is incomplete.
- **The right to erasure** – You have the right to request that erase your Personal Data, under certain conditions.
- **The right to restrict processing** – You have the right to request that restrict the processing of your Personal Data, under certain conditions.
- **The right to object to processing** – You have the right to object to the Operator’s processing of your Personal Data, under certain conditions.
- **The right to data portability** – You have the right to request that the Operator transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email: invite@elama.global

VIII. ADVERTISING, SURVEYS, RECEIVING ONLINE NEWSLETTERS, NOTIFICATIONS AND TERMS OF REJECTION

The Operator has the right to perform the following types of information distribution and sending notifications related to the use of the System by registered Users and Users who have agreed to receive the mailing:

- Newsletters and information about promotions - news and newsletters about internal changes and developments in the SEO industry, online marketing and placement of advertisement positioning on the Internet.
- Phone calls - calls from employees of the System (including, but not limited to, calls from managers, technical support specialists, system consultants) related to the use of the System;
- System notifications - notifications related to the use of the System and necessary for obtaining the Systems of the System (including but not limited to: system actions related to the confirmation of the password, notifications of the account balance, notification of system errors, notice of write-off of funds and so forth).

You can refuse to receive, both from the entire System newsletter mailing and phone calls, and from each one individually. Refusal to receive the information distribution of the System and phone calls of the System may be carried out in the personal account of the registered User or by sending an e-mail to the following address: invite@elama.global

Taking into account that the receipt of system notifications is a necessary condition for using the System, the refusal to receive system notifications is possible only upon deleting the account on the System of the registered User.

IX. COLLECTION AND USE OF NON-PERSONAL DATA

In addition to your Personal Data, whenever you visit or interact with the System the Operator and/or its designated third parties may automatically or passively collect certain information relating to your Internet and System use, such as information about your Internet service provider, your operating system and device from which you access and use the System, browser type and build, type and serial number of your mobile device (if and where applicable), Internet protocol address, mobile network and country codes, time zone, domain name from which you access the System, the pages and areas of the System that you visited, System functionality you used, the date and time you accessed the System, and other information about your web surfing preferences and interests that is not personally identifiable. You hereby expressly agree that collection of such non-personal information does not constitute collection, use or other processing of your Personal Data. Notwithstanding this, you hereby grant the Operator, all of its affiliates, subsidiaries and designees, including but not limited to the Operator’s designated personal data

processing contractor(s) (if and where applicable) your express consent for collection, use and/or other processing of all non-personal information described above.

Any and all non-personal information collected and processed by the Operator and/or its designated third parties is used strictly for the purposes of customizing the System in accordance with general user preferences, as well as for marketing purposes. You hereby agree that the Operator and/or its designated third parties are free to disclose any and all such non-personal information to third parties of their choice, including but not limited to third party advertisers and other parties.

X. ACTIONS REQUIRED BY LAW AND OTHER SPECIAL CIRCUMSTANCES

Notwithstanding that the Operator, its affiliates, subsidiaries and designees, as well as its designated personal data processing contractor(s) treat your Personal Data in a strictly confidential manner and do not and will not disclose it to third parties without your prior written consent or not in accordance with your consents granted herein, the Operator and discussed parties reserve the right to disclose your Personal Data to third parties at their sole discretion and without obtaining your prior consent and without notification to you in the following special circumstances:

- if you are found to be, or the Operator has reasonable grounds to believe, that you are violating the Terms of Use, Privacy Policy or other legal agreements relating to your use of the System; if such disclosure of your Personal Data is required to fulfill Operator's obligations under applicable law;
- if such disclosure of your Personal Data is required under governmental or legal requests for information, including but not limited to under the request of any governmental authorities, including but not limited to local and international police authorities and courts conducting an investigation;
- if such disclosure of your Personal Data is required to identify, contact, or bring legal action against another user of the System who may be violating the Terms of Use, Privacy Policy or legal agreements relating to your use of the System;
- if such disclosure of your Personal Data is required to respond to an emergency; or
- if such disclosure of your Personal Data is required otherwise to protect the rights, property, safety, or security of third parties, other users of the System or the general public in any jurisdiction whatsoever.

XI. PROTECTION OF PERSONAL INFORMATION

The Operator uses commercially reasonable technical, organizational and administrative safeguards to help protect and secure your Personal Data. The System and physical facilities with the servers hosting the System utilize certain electronic security measures designed to protect against the loss, misuse, and alteration of the information under Operator's control, including Personal Data, which measures fully correspond to requirements set forth under applicable law.

However, you acknowledge and agree that no electronic data transmission or storage of information can be guaranteed to be fully secure, and while the Operator makes and will continue to make every reasonable effort to ensure the integrity and security of System-related networks and systems and safety of your Personal Data, the Operator cannot and does not guarantee that security measures implemented on the System will prevent third-party hackers or other users from illegally obtaining information about you, including your Personal Data.

Please note that the Operator cannot ensure or warrant the security of any information you transmit via the System, including your financial transaction information. You hereby expressly acknowledge and agree that you use the System at your own risk.

XII. COOKIE POLICY

The technologies used in relation to the System may include cookie files. A "cookie" is a small data file that can be sent to and placed on your computer's hard drive or mobile device, whichever is applicable, when you access and use the System.

The Operator may deploy cookie files to collect, store, and sometimes track information for statistical purposes to improve the System and the functionality and services it offers, as well as to store user preferences, to record session information, to record user-specific information on what pages you access or visit, to record past activity on the System to provide better service when you return to the System, to personalize your user experience relating to the System, to enable or support security features built into the System, sending you customized advertising basing on your preferences, to ensure that you are not repeatedly sent the same advertising or notifications, to customize System content based on users' browser type or other information that the user sends or that may require for maintenance, improvement and enhancement of the System.

The Operator may also deploy "web beacons" and similar technology to assist with delivery of the cookie to your computer or mobile device. Note that blocking or rejecting cookies on your computer or other device may prohibit you from accessing and/or using certain functionality or services available on the System. You hereby expressly consent to the Operator placing the cookies on your computer's or other computing or mobile device's hard drive for the purposes discussed in this Section, including but not limited to System maintenance and improvement, and your accessing and using certain functionality and services of the System.

Please note that in order to be able to use certain functionality of the System you may be required to enable cookies within your Internet browser settings. Different Internet browsers use different settings with respect to the cookies. You are solely responsible for enabling cookies in your Internet browser settings.

XIII. THIRD-PARTY WEBSITES AND COOKIES

The System may contain hyperlinks to other websites that are not maintained by, or related to, the Operator or its affiliates. It is your responsibility to review the privacy policies of those websites. This Privacy Policy applies only to the System.

Advertisers and other third parties may also use their own cookies. The Operator does not control the use of such third party cookies and expressly disclaims any and all responsibility for any information collected by third parties through use of such third party cookies.

XIV. TERMS OF PROCESSING, UPDATING AND DELETING PERSONAL DATA

Your Personal Data is processed and stored by the Operator and/or its designated personal data processing contractor(s) (if and where applicable) for the total period required for providing you access to the System and the ability to use the System, providing you with notifications and sending you promotional materials, and using your Personal Data for other purposes set forth in this Privacy Policy and to which you expressly consent, but for no longer than 3 (Three) years, if you do not request the Personal Data to be deleted earlier in accordance with this Section.

If you decide to terminate your account within the System, the above term will apply to storage of your Personal Data and your Personal Data will remain in Operator's archives for that period.

You have the right to request the Operator to update or delete your Personal Data by sending an e-mail to the following address: invite@elama.global. Your Personal Data will be updated or deleted, depending on the nature of your request, in 10 (Ten) business days as of receipt of your request. You may also send a

request to fully delete your Personal Data in writing to the following address: eLama International Platform Ltd. Inniscarra, Main Street., Rathcoole, Co. Dublin, D24 E029, Ireland

The Operator is under no obligation to store your Personal Data indefinitely and hereby disclaims any liability arising out of, or related to, destruction of such Personal Data.

XV. GOVERNING LAW

This Privacy Policy shall be governed by the laws of the European Union including The EU General Data Protection Regulation (GDPR).

XVI. CHANGES TO PRIVACY POLICY

To the fullest extent permitted under applicable law, the Operator reserves the right to modify, update, supplement, revise or otherwise change this Privacy Policy in order to comply with applicable new legislation and/or regulations and/or to improve the System, and to impose new or additional rules, policies, terms or conditions in relation to the System, from time to time. The latest version of the Privacy Policy is always available on our website.

The Operator will notify you of the amendments to this Privacy Policy by sending an email message to the email address listed in your account information or by posting the notice on the System.

XVII. CONTACTS

If you have any comments or questions concerning this Privacy Policy, processing and use of your Personal Data, or if you would like the Operator to update or delete your Personal Data, please contact the Operator using the following contact details:

Data Protection Officer - specialist responsible for monitoring compliance with the conditions for the collection, processing and transfer of personal data – Anthony Brady (Email: a.brady@elama.global)

For questions regarding the Privacy Policy, data processing: invite@elama.global

To request update or deletion of your Personal Data: invite@elama.global

Operator address: eLama International Platform Ltd. Inniscarra, Main Street., Rathcoole, Co. Dublin, D24 E029, Ireland