

Privacy Policy

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This Privacy Policy together with our Terms of Use applicable to you and any additional provisions that may be incorporated by reference into the terms apply to your use of our **Website “Anymaster”** accessible from <https://anymaster.com> (“**Website**”) operated and managed by Anymaster LTD (hereinafter the “**Company**”, “**we**”, “**us**” or “**our**”).

This Privacy Policy sets out the basis which we apply to process any personally identifiable information (“**Personal Data**”) we collect from you, or that you provide to us. Please read this Privacy Policy carefully to understand our practices regarding your Personal Data and how we will process it. One of our main priorities is the privacy of our users.

If you do not agree with this Privacy Policy in general or with any part of it, you should not use our Website.

This Privacy Policy applies only to our online activities and is valid for visitors to our Website with regards to the information that they share on Website and/or Website collects. This Policy is not applicable to any information collected offline or via channels other than this Website.

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1. Who We Are

Anymaster LTD is the data controller and is responsible for your Personal Data. Our full details are:

Postal address: help@anymaster.com

Email address: help@anymaster.com

WhatsApp: +357 96110040

2. Information We Collect

2.1. Registration

2.1.1 When you register to use Website by establishing an account, we will collect following Personal Data:

- Full name;
- Address;
- Phone number;
- Email.

2.1.2 In order to keep your Personal Data accurate and complete, you can log in to review and update your account information via your account settings page. Inaccurate information may affect your ability to use our Website, the information you receive when using Website, and our ability to contact you.

2.2 When You Use Website

2.2.1 When you use our Website, we will collect following Personal Data:

- User generated content: any data submitted by the Participant of his/her own choice. When you use Website, you may provide us with any text or images that you upload or provide to us in the context. Depending on the services and place of posting, this information can be available to some or all other users of our services.
- Communications data. We may receive Personal Data when you send us an email message or otherwise contact us.
- Surveys. We may receive Personal Data when you provide information in response to a survey operated by us.
- Submissions data: your feedback, comments, opinions and other submissions with regard to our services.
- Behavioral data: information about the way you use our services, its frequency and etc. (e.g., log-ins, services segments used, page views).
- Browsing data: your IP address, name of your browser, name of your Internet provider, traffic source (including the source from which our Website was installed on your device).
- Cookies stored in your browser by our Website.

2.2.2 We may require you that you provide us with additional Personal Data as you use Website.

2.2.3 We do not anyhow save or store your payment data at any period of time.

2.2.4 We also collect, use and share aggregated data such as statistical or demographic data for any purpose (“**Aggregated Data**”). Aggregated Data could be derived from your Personal Data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific software feature. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this Policy.

2.2.5 We do not collect any special categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, data about your health data).

2.2.6 Depending on how you interact with us, we will process your Personal Data in order to:

- Providing the basic services under the Terms of Use, fulfill our contractual obligations;
- Respond to your requests, for example to contact you about a question you submitted to our customer service team;
- Inform you about changes in your services, our service offering and other important service-related notices;
- Perform research and analysis about your use of, or interest in, our products, services, or content, or products, services or content offered by others. Provide, improve, and personalize our services;
- Comply with applicable legal or regulatory obligations, including complying with requests from law enforcement or other governmental authorities, or in legal proceedings involving Website;
- Communicate with you, either directly or through one of our partners, including for customer service, to provide you with updates and other information relating to our Website, and for marketing and promotional purposes;
- Prevent and investigate fraudulent or other criminal activity.

2.3 Cookies

2.3.1 Like any other website, Website uses “Cookies”. Cookies are small text files accepted and processed by device that you use to access our Website. They are used to store information including visitors' preferences, and the pages on Website that the visitor accessed or visited. The information is used to optimize the users' experience by customizing our web page content based on visitors' browser type and/or other information.

2.3.2 The following types of cookies are used on the sites:

- Strictly necessary cookies / technical cookies: these cookies are required to run Website and provide you with the services and may, among other, allow us to identify your hardware and software, including your browser type;
- Statistical / analytic cookies: these cookies enable us to recognize users, count the number of users and collect information such as your actions on our Website, including the web pages you visit and the content you retrieve;
- Performance cookies: these cookies collect information about how users interact on Website, enabling us to identify errors and test new functionalities to improve its performance;
- Functionality cookies: these cookies enable us to provide specific functionalities in order to improve your experience on Website, for example by storing your preferences (e.g., language and location);
- (Third party) tracking / advertising cookies: these cookies collect information about users, sources of traffic, page visits and advertising displayed to you and followed by you. They enable us to display advertising which may be of interest to you based on collected Personal Data. These cookies are also used for statistical and research purposes.

2.3.3 Website only uses the information contained in the cookies for the above purposes, after which the data collected will remain stored on your device for a period that may depend on cookies type, but no longer than necessary to achieve their purpose and will be automatically removed from your system thereafter.

2.3.4 Personal information collected through cookies placed on your device may be transmitted to and accessed by us or the third parties referred to in this policy. The use of Personal Data outside our Website for advertising purposes, if any, may be subject to separate policies available on the above third parties' websites. Website or those third parties might also provide you with a

possibility to opt out of personalized advertising, which shall be subject to laws and regulations applicable to such products, utilities, and offerings.

- 2.3.5 The first time that you access Website, your approval for the use of these cookies may be requested. If after you have approved the use of cookies you want to make another choice, you can do this by deleting the cookies stored by your browser (usually via the options in your browser's Privacy menu – please refer to your browser's manual or developer's website). The pop-up requesting your approval may then show up again and you can make a different choice. If you do not consent to the use of cookies, certain features of Website might become unavailable, which may affect your browsing experience. You may also set up your browser preferences to accept or decline by default all cookies or cookies from specific websites, including our Website.
- 2.3.6 Website may also use web beacons (pixel tags) in order to access the cookies previously placed on your computer for the following purposes:
- To track your actions on Website and when using Website, by accessing and interacting with the cookies stored on your computer;
 - To collect statistical information related to operating Website or products, utilities, advertisements or other offerings.

3. How We Protect And Store Your Personal Data

- 3.1 All Personal Data is stored securely in accordance with the EU General Data Protection Regulation (Regulation (EU) 2016/679) (“**GDPR**”).
- 3.2 We implement a variety of security measures to maintain the safety of your personal information when you place an order or enter, submit, or access your personal information.
- 3.3 Data security is of great importance to us, and to protect your data we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure data collected through our Website.
- 3.4 Notwithstanding the security measures that we take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to us data via the internet.
- 3.5 We are constantly working on creation, improvement and further implementation of both administrative and technical measures for securing your data from any unauthorized actions which can be carried out by third parties or occur incidentally, such as unauthorized access, disclosure, alteration, destruction or other malicious use of your data, as well as incidental loss or corruption of such data. We undertake all reasonable steps and measures which are necessary to ensure your data is treated securely and in accordance with this Privacy Policy.
- 3.6 Some or all of your data may be stored or transferred outside of the European Economic Area (“**the EEA**”) (The EEA consists of all EU member states, plus Norway, Iceland and Liechtenstein). You are deemed to accept and agree to this by using our Website and submitting information to us. If we do store or transfer data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the EEA and under the GDPR. Such steps may include, but not be limited to, the use of legally binding contractual terms between us and any third parties we engage and the use of the EU-approved Model Contractual Arrangements.

4. How Long We Store Your Personal Data

- 4.1 We retain any of your Personal Data which we collect for as long as your Website account is active according to the Terms of Use, and/or for as long as it is necessary to provide you with the services, and while we have a valid lawful ground for processing your Personal Data. We also erase your Personal Data after reaching the purposes for which we collected such data.
- 4.2 Please consider that we have the right to continue to retain some of your user data even after

complying with your request to delete such data in the following cases:

- We have the lawful basis to further process your data other than a consent from you. We may be required to do so in order to comply with applicable laws (for example, for tax or accounting reasons, know-your-customer, anti-laundersing or other legal requirements and obligations);
- Your user data has been anonymized in the way it cannot be used for identifying you, and therefore is no longer your personal identifiable data.

5. Transferring Your Data

5.1 Sharing Your Data with Third Parties

For the purposes of processing your Personal Data under this Privacy Policy Company may share your data with third parties.

Category of Recipient	Partner Examples or Explanation	Share Purpose
Our affiliates	Any legal entity affiliated to Company	Any purpose, mainly: Providing the basic services under Terms of Use Organizing the work of customer support service
Auditors, lawyer, and other examination organizations	Any entity conducting audit or other legal/financial check	Compliance with our legal obligations imposed by applicable laws (in certain cases provided by law)
Third party service providers whose activities are required to perform the service	Web hosting, information technology providers	Providing the basic services under Terms of Use
Data aggregation, analytics, and market research services	Google Analytics	Creating and utilizing analytics on our services and audience Conducting advertising and marketing activity Conduct surveys and research Personalizing our services for you
Advertising partners	Any partner	Conducting advertising and marketing activity Personalizing our services for you
Relevant parties in the event of change in control, merger, or acquisition		As our business develops, we may sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Data may be part of the transferred assets.

Authorities and parties where relevant for compliance with various laws	Any authority	Compliance with our legal obligations imposed by applicable laws
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- 5.1.1 We require our services providers to agree to take reasonable steps to keep Personal Data that we provide to them secure. We do not authorize them to use or disclose your Personal Data except in connection with providing their services.
- 5.1.2 In the future, we may enter into contracts with other partners. If this is the case, then we will make every reasonable effort to update the list of our partners which is provided in this Privacy Policy in a timely manner, but in any way no later than once every six months, or more often in the event of a significant change in our data processing practices.
- 5.1.3 We minimize the amount of personal information we disclose to what is directly relevant and necessary to accomplish the specified purpose. Apart from the above, we do not transfer your personal information to any other third party without your prior approval.
- 5.1.4 We may transfer your data to our counterparties (partners, affiliates and etc.) in different countries, including those which are located outside the EEA. We do all our efforts, including those imposed on us by applicable law, to ensure an adequate level of personal data protection in each case, however, we would like you to consider that the countries to which we transfer your data may not have the same data protection laws as your jurisdiction. To facilitate our operations, Company may transfer, store and process your operations with our partners and service providers based outside of the country in which you are based. Laws in those countries may differ from the laws applicable to your country of residence. Where we transfer, store and process your Personal Information outside of the EEA or the UK we will ensure that the appropriate safeguards are in place to ensure an adequate level of protection such as through acceding to the Standard Contractual Clauses. Further details regarding the relevant safeguards can be obtained from us on request. Therefore, by using Website or submitting Personal Data for any of the above purposes, you acknowledge that your Personal Data may be transferred or may be stored in the United States of America or other countries outside of the EEA, and the United Kingdom. Such countries may have data protection rules that differ from or are less stringent than those of your country.

5.2 Marketing Mailings

- 5.2.1 If you provide us with your email address and agree to this Privacy Policy, we and our partners may send you emails regarding the products we offer. You can choose to opt out of receiving email from us at any time.
- 5.2.2 If you provide us with your telephone number and agree to this Privacy Policy, we and our partners may send you texts regarding the products we offer. You can choose to opt out of receiving texts from us at any time by emailing us at help@anymaster.com or WhatsApp +357 96110040.

6. Consent

- 6.1 By submitting information, including Personal Data, you are expressly and voluntarily accepting the terms of this Privacy Policy. You have the right to withdraw your consent to the Website's collection and use of your information but your withdrawal of consent will not be retroactive.
- 6.2 You should also be aware that we do not sell, rent your Personal Data or disclose it in exchange for money or other valuable consideration to any third parties and we shall not incorporate such practice in our business, unless providing you with a clear and explicit way to exercise your opt-out right and before introducing appropriate changes to this Privacy Policy.
- 6.3 You consent to transfer your Personal Data to third parties as described in this Privacy Policy, including to provide our services, unless otherwise compelled by law or as necessary to enforce our

Terms of Use or to protect the rights or property of Company or its users or the public. We may provide Aggregated Data about the usage of Website to third parties for purposes that we deem, in our sole discretion, to be appropriate.

- 6.4** Other users, including third parties, may see the content and information you provide (name, email address, phone number, text or images). We can also view, record or save content related to the communication among the users, messages sent to or by everyone, as well as files of different formats, or other information that is shared at Website.
- 6.5** Our Website may contain links to third-party websites and applications. Subject to your opt-out preferences, we may also use third-party advertisers, ad networks, and other advertising, marketing, and promotional companies, to serve advertisements on our Website. This Privacy Policy does not apply to other advertisers or websites. We do not endorse these parties, their content, or any products and services they offer, and we are not responsible for the information practices of such third-party websites or applications. Thus, we are advising you to consult the respective Privacy Policies of these third-party ad servers for more detailed information. It may include their practices and instructions about how to opt-out of certain options.

7. Your Legal Rights

7.1 General Rights

Your Right	Right Explanation
Right to access	You have the right to request the copy of your Personal Data processed by Company
Right to rectification	You have the right to request that we correct any information you believe is inaccurate, incomplete, outdated, incorrect, unlawfully received or no longer relevant for the purpose of processing
Right to restrict processing	You have the right to restrict the use of your Personal Data in certain circumstances entirely or in part where possible, unless we have an opposite obligation required by applicable law
Right to erasure (“right to be forgotten”)	You can request the Company to erase any of your data unless we have an opposite obligation required by applicable law
Right to portability	You have the right to receive your data in a structured, commonly used and machine-readable format or to request Company to directly transmit those data to a third party where technical possible and reasonable
Right to object to processing	You have the right to object to the processing of your Personal Data
Right to complain to a supervisory authority	Every data subject has the right to lodge a complaint with a supervisory authority, in particular in the state of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes GDPR.
Right to be informed of what data processing is taking place	The controller’s obligation to inform includes his identity, the contact data of the Data Protection Officer (if available), the processing purposes and the legal basis, any legitimate interests pursued, the recipients when transmitting personal data, and any intention to transfer personal data to third countries. In addition, the right to be informed also includes information about the duration of storage, the rights of the data subject, the ability to

	withdraw consent, the right to lodge a complaint with the authorities and whether the provision of personal data is a statutory or contractual requirement. In addition, the data subject must be informed of any automated decision-making activities, including profiling. Only if the data subject is already aware of the above information it is not necessary to provide these.
Right to not be subject to a decision based solely on automated processing	The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.
Other rights	You may have other rights in accordance with this Privacy Policy and applicable laws

7.2 How To Exercise Your Data Protection Rights:

- 7.2.1 In order to exercise your data processing rights stated, you must send us a request via our support service: e-mail help@anymaster.com or WhatsApp +357 96110040, and follow the instructions provided.
- 7.2.2 Please note that in some cases, in order to comply with a request, we may ask you to provide us with some additional information where this is necessary to identify you as our user. We undertake to comply with your request free of additional charge within one month of receipt, but in some cases this period may be extended by further two months. We have the right to refuse to comply with your request or charge a reasonable fee if your request is manifestly unfounded or excessive.
- 7.2.3 Please note that complying with your request to restrict processing or to erase your personal data may result in the deletion of your Website Account, so please consider this when deciding to exercise these personal data rights.
- 7.2.4 Some of the aforementioned rights may have some limitations in terms of their exercising due to obligations imposed on Company by applicable laws. As instance, in some cases we have to archive your data and continue to store it for a certain period of time (which depends on the requirements set forth by applicable law) even after you requested full erasure of such data.
- 7.2.5 You are entitled to withdraw your consent to process your data under this Privacy Policy at any time by initiating the deletion of your Website account through your account settings and following the instructions provided by Company after your sending such a deletion request.
- 7.2.6 If you wish to withdraw your consent in respect of a particular processing purpose, please contact us. However, we reserve the right to cease providing you the services if your withdrawal is not consistent with providing services in the manner prescribed by Terms of Use. Please note that such withdrawal does not have any impact on the validity of the consent before withdrawal and we reserve the right to process your data on other lawful basis if permitted by applicable law.
- 7.2.7 The opt-out opportunity applies only to the processing of your data based on your consent, unless otherwise is explicitly stated by the applicable law. We still have the right to process your data based on the other lawful basis such as contract performance, legitimate interest or legal obligation, if available by virtue of applicable law, even if you have opted out such processing according to the provisions of this Privacy Policy section, however, in this case you are still able to exercise your right to object, at any time.

7.3 Children's Information

- 7.3.1 Another part of our priority is adding protection for children while using the internet. We encourage parents and guardians to observe, participate in, and/or monitor and guide their online activity.
- 7.3.2 Website is not directed to children under eighteen (18) years of age and we do not knowingly collect Personal Data from children under the age of eighteen (18). If we discover that a person under

eighteen (18) has provided us with Personal Data, we will promptly delete such Personal Data from our systems.

8. General

8.1 Changes To Privacy Policy

8.1.1 This Policy may be modified from time to time, thus, check back often. So that you are aware changes have been made, we will adjust the “Last Revised” date or “Date of publication” at the beginning of this document. The new policy may be displayed on-screen, and you may be required to read it to continue your use of Website.

8.1.2 Continued access to our products, services by you will constitute your acceptance of any changes or revisions to this Policy.

8.2 Compliance with Applicable Legislation

We are committed to complying with applicable privacy and data protection laws and regulations designed to protect your personal information, including, but not limited to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR) and other applicable current or future regional and state privacy and data protection laws and regulations worldwide as they become effective.

9. Questions, Problems or Complaints

If you would like to exercise your legal rights, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact us: help@anymaster.com or WhatsApp +357 96110040.