

Privacy Policy

This policy describes how Beletage Digital LTD ("the company" or "we") processes and protects the personal data of Deburse users.

The policy applies to both registered and unregistered users ("users" or "you"). The Policy applies regardless of the device from which you use Deburse, and regardless of the communication channel through which you access Deburse.

By submitting personal data to us, you are consenting to the processing of that data in accordance with this Policy.

1. Definitions

Personal Data - any information relating to a directly or indirectly identified or identifiable natural person (data subject).

Processing of personal data - any action or set of actions in respect of personal data, including collection, recording, systematization, collection, storage, updating and modification, extraction, use, transfer (distribution, provision, access), blocking, deletion and destruction - both with and without the use of automated data processing.

2. What data we process

We process personal and technical data.

You provide personal data to us when you:

- registering on Deburse;
- use Deburse and its services;
- when you sign up to our newsletters;
- participate in events, surveys and polls;
- write or call us;
- communicate with other users;
- exercise your rights and perform your duties as set out in terms and conditions of use
- terms and conditions of service
- secure payment terms and conditions on Deburse
- legislation.

Your device automatically transfers technical data: information saved in cookies, information about your browser and its settings, date and time of access to Deburse, addresses of requested pages, website or application activities, technical characteristics of your device, IP address, etc.

3. Why we process data

We process personal and technical data to:

- enable you to use Deburse and its services: create a profile, post ads, pay for services, etc.;

- ensure the stable operation and security of Deburse, improve the user experience, the quality of the services and the company's marketing activities;

- prevent and suppress violations of the law, the Deburse Terms of Use and the Deburse Service Agreement;

- respond to your requests;

- fulfil your statutory obligations (for example, for accounting, tax reporting, answering government requests);

send you marketing messages about our partners;
organise your participation in events, research and surveys of the company and our partners;
and for other purposes with your consent.

4. Legal basis for processing

We process your personal data with your consent;
to enter into, execute, amend or terminate the Deburse Terms of Use and the Deburse Service Agreement;
to exercise the rights and lawful interests of the company or a third party in so far as this does not infringe on your rights and freedoms;
to comply with any statutory duties imposed on us by law.
We do not process special categories of personal data. We do not process biometric personal data to identify you.

5. Transfer to third parties. Cross-border transfer

We may transfer personal data to or entrust the processing of such data to third parties. For example, if you have ordered delivery by Deburse, we transfer your data to the delivery service.

We only transfer personal data to countries that provide adequate protection.

We will never share your data with spammers.

6. Deburse is an open source

Take responsibility for your information on the internet. Your listings, reviews and profile details are visible to everyone on the internet when they visit Deburse.

The purpose for which users add data to Deburse is to make contact with a potential buyer (client, agent) who is interested in closing a deal on the ad. You may not process user data for any other purpose. You may not call users to offer them your services. You may not copy users' data to post and store it on other services. It is forbidden to use public data for scoring purposes. All of this is illegal.

7. Security

Responsible handling of personal data is a company standard.

To protect personal data, we:

Issued and published a user data policy on the website. Approved local acts on the processing and protection of personal data. Employees familiarise themselves with these documents on their first day at the company.

Appointed a person responsible for organising the processing of personal data.

Conducted training sessions for employees on the topic of personal data.

Regularly check company processes and documents for compliance with the law.

We assess the risks and damage that could arise if the law is breached. Based on the assessment we select suitable measures to comply with the law.

Apply legal, organisational and technical measures to ensure the security of personal data.

We base our data protection measures on legal requirements;

The specified security level of personal data;

Current threats as defined by our threat model;

A core set of security measures established by regulation for the security level in question;
the risk-based approach to choose the best measures;
priority of legitimate interests of users.

8. Term of processing

We will cease to process your personal data:

Upon expiry of the consent period or upon withdrawal of consent (unless there are other grounds for processing required by law).

You give your consent for 5 years from the date of deletion of your profile on Deburse. A different period of time may be provided in individual cases;

when the purposes of processing have been achieved or when it is no longer necessary to achieve them (unless there are other grounds for processing provided for by law);

where unauthorised processing has been detected where it cannot be lawfully enforced;

in the event of liquidation of the company.

The law requires us to retain user information for a period of one year after deleting the profile.

9. Contact us

To ask a question or withdraw your consent to the processing of personal data, please contact nick@debourse.com.

10. Changing our policy

We will update this policy when necessary. By continuing to use Deburse after we have changed the policy, you agree to the changes.