

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

1. Definitions

Personal data is any information that relates to an identified or identifiable living individual (data subject).

Processing of personal data refers to any operations performed on this personal data including collection, recording, systematization, 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 your personal data to us when you:

- register on Deburse;
- use Deburse and its services;
- 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 in accordance to:
 - Deburse Terms and Conditions
 - Service agreement
 - Deburse secure payment terms and conditions
 - Legislation

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

3. Why we process data

We process personal and technical data in order to:

- provide you with an access to 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 and 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 inquiries;
- fulfil your statutory obligations (e.g., for accounting, tax reporting, answering government requests);
- send you marketing messages about our partners;
- organize 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 conclude, 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 such manner that does not infringe on your rights and freedoms;
- to comply with any statutory duties imposed on us by law.

We do not process special category data. We do not process biometric personal data to identify you.

5. Transfer to third parties. Cross-border transfer

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

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

We will never share your data with spammers.

6. Debourse is an open source

Be responsible when sharing your personal information on the Internet. Your listings, reviews and profile details are visible to all Debourse users.

The goal of users sharing their data on Debourse is to contact a potential buyer (customer or 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 the above is illegal.

7. Security

Responsible handling of personal data is a company standard.

To protect your personal data, we:

- Have issued and published a user data policy on the website. We have approved local acts on the processing and protection of personal data. Employees familiarize themselves with these documents on their first day at the company.
- Have assigned a person responsible for organizing the processing of personal data.
- Have conducted training sessions for employees on the topic of personal data.
- Regularly monitor company processes and documents for compliance with the law.
- Assess the risks and damage that may arise if the law is breached. Based on the assessment, we select suitable measures to comply with the law.
- Apply legal, organizational and technical measures to ensure the security of personal data.

Our data protection measures are based on:

- legal requirements;

- the established security level of personal data;
- current threats as defined by our threat model;
- a core set of security measures established by regulatory legal acts to ensure an appropriate level of security;
- the risk-oriented approach to select the best measures;
- priority of legitimate interests of users.

8. Processing times

We will cease the processing of your personal data:

- upon expiration 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, effective the date when your profile on Debourse was deleted. A different time frame may be provided in certain 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 required by law);
- when unauthorized processing has been detected whereas 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 support: nick@debourse.com.

10. Changing our policy

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

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