

Eurogold Industries Privacy Policy

This Privacy Policy is effective from September 30, 2018.

We, at Eurogold Industries Ltd. (hereinafter - "we", "us", "Eurogold Industries"), have created a Privacy Policy that aims to help you understand what Data we collect, what we use it for and how you can exercise your rights. Reading Privacy Policy is important, so we hope you will give it time and attention.

For us the privacy and security of our Contractors and Visitors are of paramount importance. We are committed to protecting the Data you share with us. This privacy policy explains how we process Personal Data collected through use of our website and during collaboration with us.

Personal data - any information that can be used to identify you as a natural person. This goes well beyond the historical definition of personally-identifiable information to include the person's name, email address, social media posts, physical, physiological, or genetic information, medical information, location, bank details, IP address, cookies, cultural identity, etc.

For the purposes of this Policy, we define the term "Contractor" as a legal entity which have concluded an agreement with us or intends to conclude it and the term "Visitor" as an individual who visits [our website](#).

Personal Data may be freely provided by the Contractor and Visitor, or, in case of Usage Data, collected automatically when using Eurogold Industries website.

Any use of Cookies – or of other tracking tools – by Eurogold Industries or by Data Controllers of third-party services used by Eurogold Industries serves the purpose of providing the Service required by the Visitors and Contractors, in addition to any other purposes described in the present document and in the Cookie Policy.

Contractors and Visitors are responsible for any third-party Personal Data shared with Eurogold Industries and confirm that they have the third party's consent to provide this Personal Data to us.

We adhere to the following principles in order to protect your privacy:

- principle of purposefulness - we process personal Data fairly and in a transparent manner only for the achievement of determined and lawful objectives, and they shall not be processed in a manner not conforming to the objectives of Data processing;
- principle of minimalism - we collect personal Data only to the extent necessary for the achievement of determined purposes and do not keep personal Data if it is no longer needed;

- principle of restricted use - we use personal Data for other purposes only with the consent of the Data subject or with the permission of a competent authority;
- principle of Data quality - Personal Data shall be up-to-date, complete and necessary for the achievement of the purpose of Data processing;
- principle of security - security measures shall be applied in order to protect personal Data from unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical and organisational measures;
- principle of individual participation - the persons shall be notified of Data collected concerning him or her, the persons shall be granted access to the Data concerning him or her and the persons have the right to demand the correction of inaccurate or misleading Data.

1. Data We Collect

1.1. Website Visitors

- 1.1.1.** We may collect, record and analyze information of Visitors of our website.
- 1.1.2.** We collect name and email address only in a case when Visitor wants to contact us and fills our contact form. We use the collected Data only to communicate with You. If You do not want us to collect your Data, please do not use our contact form and do not give your consent for it.
- 1.1.3.** While processing Personal Data of our Visitors, we rely on your consent to the processing of your Personal Data for the purpose to communicate with you. When we share such information with our contractors (which may be located outside of the European Economic Area) in order to provide a requested answer or solution promptly and correctly, we also rely on your consent. We use such Data in ways you would reasonably expect and which have a minimal privacy impact. You can withdraw your consents at any time by sending us one more email to office@eurogold-industries.com with your withdrawal and your Personal Data will be deleted in 72 hours.
- 1.1.4.** We also record Usage Data. It is information collected automatically through Eurogold Industries website (or third-party services employed by Eurogold Industries), which can include: the IP addresses or domain names of the computers utilized by the Visitors who use Eurogold Industries, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer

(successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the Visitor, the various time details per visit (e.g., the time spent on each page) and the details about the path followed with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the Visitors' IT environment.

- 1.1.5. Visitors can control the use of Cookies at the individual browser level. If you reject Cookies, you may still use our website, but your ability to use some features or areas of our website may be limited. To learn more and for a detailed Cookie notice, the Visitor may consult the Cookie Policy.
- 1.1.6. Processing of Usage Data is relied on our legitimate interests. It is necessary for managing and running our business efficiently and effectively, providing quality services including website support, developing and improving products, determining who may be interested in them.
- 1.1.7. When you contact us by telephone or email, you give us your implicit consent because you reasonably expect us to reply. We collect the Data you give us in order to reply with the information you need. We may record your request and our reply in order to increase the efficiency of the organisation of our support service. We keep personally identifiable information associated with your message, such as your name, email and mobile telephone number, so as to be able to track our communications with you in order to provide you with high quality service.
- 1.1.8. We may record telephone conversations to improve our support quality and train our employees. We always warn you about this at the beginning of every conversation.
- 1.1.9. Wherever possible, we aim to obtain your explicit consent to process your Personal Data, for example, by asking you to agree to use Cookies or received marketing emails.
- 1.1.10. By registering on the mailing list, the Visitor's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning Eurogold Industries. Your email address might also be added to this list after becoming a Contractor.

1.2. Contractors

- 1.2.1. We must process the information you give to us, in order to carry out our obligations under a contract between you and us or in order to take steps at the request prior to entering into a contract.

- 1.2.2. We collect names, job titles, email addresses and telephone numbers of employees, which represent the Contractor. This information is used by us to identify the Contractors, provide them with services, mailings, notification, support and marketing actions, and to meet other contractual obligations.
- 1.2.3. We rely on your explicit consent when we send email messages containing information of commercial or promotional nature. You can withdraw your consent by following the "unsubscribe" link which you will find on all the email marketing messages we send you. Alternatively, you can contact us at office@eurogold-industries.com.
- 1.2.4. After fulfilling contracts, we store relevant information about our Contractors. We rely on our legitimate interests. It is necessary for managing and running our business efficiently and effectively, providing quality services including developing and improving products, determining who may be interested in them.

2. Compliance with General Data Protection Regulation (GDPR)

- 2.1. For Visitors and Contractors located in the European Economic Area (EEA) privacy rights are granted and all processing of Personal Data is performed in accordance with regulations and rules following the [Regulation \(EU\) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such Data, known as the General Data Protection Regulation \(GDPR\)](#).
- 2.2. We process Personal Data as a Controller, as defined in the GDPR:
 - Eurogold Industries with whom you as a Contractor have entered into an agreement will be the Controller for Contractors' Data as outlined above in "Contractor" section.
 - Also Eurogold Industries will be the Controller for Visitors' Data, as outlined above in "Visitor" section.

3. Your rights

- 3.1. Visitors and Contractors can review, correct, update, delete or transfer their personally identifiable information. For that, contact us directly at office@eurogold-industries.com. We will acknowledge your request within seventy-two (72) hours and handle it promptly and as required by law.
- 3.2. Object to processing of their Data. Visitors and Contractors have the right to object to the processing of their Data by us.
- 3.3. Access to their Data. Visitors and Contractors have the right to learn if Data is being processed by Data Controller, obtain disclosure regarding certain

aspects of the processing and obtain a copy of the Data undergoing processing.

- 3.4. Verify and seek rectification. Visitors and Contractors have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- 3.5. Restrict the processing of their Data. Visitors and Contractors have the right, under certain circumstances, to restrict the processing of their Data. In this case, Data Controller will not process their Data for any purpose other than storing it.
- 3.6. Have their Personal Data deleted or otherwise removed. Visitors and Contractors have the right, under certain circumstances, to obtain the erasure of their Data from Data Controller.
- 3.7. Receive their Data and have it transferred to another controller. Visitors and Contractors have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- 3.8. You can withdraw your consents at any time by replying to the email with your withdrawal and your Personal Data will be deleted in 48 hours.
- 3.9. Also, you have the right to lodge a complaint with a supervisory authority if you think that we violate your rights. However, we recommend that you contact us first.

4. Data Retention

- 4.1. Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.
- 4.2. We will keep your Data for the period that you are our Contractor. If you are no longer a Visitor or Contractor of Eurogold Industries, we will keep your Data for the minimum length of time required to comply with the purposes set out in this policy and relevant legal or regulatory obligations. Therefore:
 - Personal Data collected for purposes related to the performance of a contract between you and us shall be retained until such contract has been fully performed. Also this information is stored by us for reasonable time after fulfilling a contract, but no more than 24 month.
 - Personal Data collected and processed with your consent shall be retained as long as we have your consent.
- 4.3. Information obtained via contact forms is deleted on an annual basis. Your information will be deleted if you did not communicate with the support team for more than 12 (twelve) months.

- 4.4. Any Usage Data collected for the purpose of analytics will be deleted in no more than 12 months after being collected.
- 4.5. Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to Data portability cannot be enforced after expiration of the retention period.

5. Information Security

- 5.1. We care to ensure the security of personal Data. We follow generally accepted industry standards to protect the information submitted to us, both during transmission and once we receive it. We maintain technical, physical, and administrative security measures to provide reasonable protection for your Personal Data. When we or our contractors process Your information, we also make sure that your information is protected from unauthorized access, loss, manipulation, falsification, destruction or unauthorized disclosure. This is done through appropriate administrative, technical and physical measures.
- 5.2. There is no 100% secure method of transmission over the Internet or method of electronic storage. Therefore, we cannot guarantee its absolute security.
- 5.3. We never process any kind of sensitive Data and criminal offence Data. Also we never use automated individual decision-making.

6. Personal Data we share with others

- 6.1. We work with third party service providers which provide website development, hosting, email sending services necessary to provide products or services which you have requested.
- 6.2. We also share your Personal Data with our partner in your country to provide you with our services most effectively.
- 6.3. We use Google Analytics to monitor and analyze web traffic. [Google Analytics](#) is a web analysis service provided by Google LLC. ("Google"). Google utilizes the Data collected to track and examine the use of our website, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. Personal Data collected: Cookies and Usage Data. Place of processing: USA – [Privacy Policy](#) – [Opt Out](#). Privacy Shield participant.
- 6.4. We use [MailChimp®](#) provided by The Rocket Science Group, LLC to send email messages containing information of commercial or promotional nature concerning Eurogold Industries. Personal Data collected: email address and name – [Privacy Policy](#).

- 6.5. We use [Bitrix24](#) provided by Bitrix, Inc to build Visitors and Contractors profiles by starting from an email address, a personal name, or other information that the Visitors and Contractors provide to us. This Personal Data may also be matched with publicly available information about the potential corporate clients (such as social networks' profiles) and used to build profiles that we can display and use for improving our services. Some of these services may also enable the sending of timed messages to Visitors or Contractors, such as emails based on specific actions performed on our website. Place of processing: USA – [Privacy Policy](#).
- 6.6. We use [SiteGround](#) provided by SiteGround Spain S.L. as secure hosting facilities. Place of processing: Spain - [Privacy Policy](#). The infrastructure is secured through a defense-in-depth layered approach.
- 6.7. We may need to share your Personal Data with the third parties that provide those services. Where your Personal Data are transferred outside of the European Economic Area (“EEA”), we require that appropriate safeguards are in place. These contractors may have access to, or process Personal Data on behalf of us, as part of providing those services to us. We limit the information provided to these service providers to the extent it is reasonably necessary for them to perform their functions.

7. Use of site by children

- 7.1. We do not provide services to children. Visitors declare themselves to be adult according to their applicable legislation.
- 7.2. Our website is not directed to persons under the age of 16. Minors may use our website only with the assistance of a parent or guardian. Under no circumstance persons under the age of 13 may use the website.
- 7.3. We collect Data about all Visitors regardless of age. We do anticipate that some of those Visitors will be children.

8. Application of this Privacy Policy

- 8.1. This Privacy Policy is applicable only to our website. This version of the Privacy Policy is effective from September 30, 2018.
- 8.2. Please be aware while visiting our site. Our website contains links to other websites. Once redirected to another website, this Policy is no longer applicable. We are not responsible for the content or privacy policies of these other sites.

9. Acceptance of these Conditions

- 9.1. We assume that all Visitors and Contractors have carefully read this document and agree to its content. If one does not agree with this privacy policy, they should refrain from using our website.

10. Changes and Updates to Our Privacy Policy

- 10.1. We may update this policy from time to time, so please review it frequently. All changes to this Privacy Policy are effective upon being posted on this page.
- 10.2. If any material changes are made to this Privacy Policy, we will use reasonable endeavours to inform you in advance by email or notice on the website. When we change this Policy in a material manner, we will let you know via email prior to the changes becoming effective and update the effective date at the top of this page.

11. Contact us!

- 11.1. If you have any questions about the practices of this website or your dealings with this website, please contact us at office@eurogold-industries.com.

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