

PRIVACY POLICY

Preliminary Remarks

As of May 25, 2018, the General Data Protection Regulation (GDPR) officially came into effect across the European Union. The GDPR's primary aim is to enhance the protection of personal data, which is defined as "any information related to an identified or identifiable natural person (referred to as the Data Subject)." This Privacy Policy is designed to offer users of this website comprehensive and transparent information regarding the handling of their personal data in compliance with the GDPR. By reviewing this document, users will gain a clear understanding of the types of data collected, the methods employed for processing this data, and their rights concerning the safeguarding of sensitive information.

Data Controller Information

In accordance with EU Regulation 2016/679, also known as the General Data Protection Regulation (GDPR), Aspenex Ltd a company with registered offices at 26 Apostolou Andrea, 4651, Trachoni, Cyprus, serves as the Data Controller responsible for the processing of personal data collected from users of the Tradeversity website, accessible via the URL <https://tradeversity.pro>. For any inquiries or notifications related to privacy matters, users are encouraged to contact the company at the following email address: support@tradeversity.pro.

Categories of Data Collected via the Website

The personal data collected and processed by Aspenex Ltd pertains to the following categories:

- **User Information:** This includes personal identifiers such as first name, last name, address, username, and password.
- **Email Address:** Data related to the user's email address, including associated features and email service providers, particularly in the case of newsletter subscription forms.
- **Device Metrics:** Information related to the devices used by the user, such as device model, brand, operating system, and a unique device identifier, particularly for enabling push notification services

Third-Party Plugins and Resources

Aspenex Ltd integrates the following third-party plugins and resources to enhance website functionality and user experience:

- **Google Analytics:** Used for collecting and analyzing metric data. Refer to Google's Privacy Policy.
- **Facebook Pixel:** Implemented to monitor and optimize marketing and advertising campaigns. Refer to Facebook's Privacy Policy.
- **Contact Form 7:** Facilitates the creation and management of contact forms. Refer to Contact Form 7's Privacy Policy.
- **WooCommerce:** Used for managing order processing and related procedures. Refer to WooCommerce's Privacy Policy.

Each of these third-party services has its own privacy policy. Users are encouraged to review these policies to understand how their data is collected, processed, and managed by these external providers.

Purposes and Methods of Data Processing

Aspenex Ltd will process Personal Data solely for the purpose of conducting standard business operations. These operations include the enhancement and provision of services, compliance with tax obligations as required by the laws applicable in the company's jurisdiction, and for marketing and communication purposes. All data processing will be conducted in accordance with this agreement and within the scope of applicable Privacy Laws.

It, therefore, commits to the following:

1. **Lawful Processing:** Personal Data will be processed in a lawful manner, implementing organizational measures designed to limit the processing of Personal Data strictly to what is necessary for the proper execution of contracts or fulfilment of legal obligations.
2. **Compliance with Data Processing Guidelines:** All Personal Data will be handled in accordance with the methods and guidelines outlined to Data Subjects in the company's privacy notices and information on data processing practices.
3. **Data Accuracy and Relevance:** Personal Data will be reviewed to ensure its accuracy, relevance, completeness, and adequacy in relation to the specific purposes for which it is being processed. This includes notifying third parties in writing of any necessary updates, modifications, corrections, or deletions of Personal Data, and taking action to update, modify, correct, or delete such data upon request.

The processing of Personal Data will be carried out using IT and telecommunication systems. This data will not be disclosed or made accessible to third parties, except as required by law.

Transfer of Personal Information

With respect to the transfer of personal data to third parties, Aspenex Ltd commits to adhering strictly to the legal requirements and directives in force, ensuring that no methods or purposes for processing are established beyond those agreed upon with its customers. In full compliance with current data protection regulations (EU 2016/679, Articles 13 and 14), any potential transfer of personal data to third parties will be subject to prior request from the user, who retains the right to object and withhold consent, except in the following circumstances:

- **Legal Requests:** Transfer of data in response to requests related to legal proceedings, official legal acts, or judicial and/or police investigations.
- **Law Enforcement:** Transfer of documents and information as requested by law enforcement agencies.
- **Service Provision:** Transfer to our business partners as required for the proper delivery of services offered by the company.

Data Retention Policy

Aspenex Ltd collects customer data to provide its services and retains this information for the duration of the contracts or until the close of the operational year to meet tax obligations. Furthermore, Aspenex Ltd retain the data for a period of one year after contract termination, solely to comply with regulatory, tax, insurance, and other relevant requirements in the regions where we operate. Once the data is no longer necessary for service provision, we implement measures to restrict access or use of the information for any purposes other than security, fraud prevention, and detection. However, we do not accept legal responsibility for any unauthorized access or hacking incidents caused by third parties. All data is stored exclusively in electronic formats, without the use of paper-based records.

Protection of Minors

Aspenex Ltd recognizes the critical importance of safeguarding children's privacy and encourages parents and guardians to actively monitor their children's online activities and interests. Individuals under the age of 18 are prohibited from creating an account. Furthermore, those below the minimum age required to provide consent for online services are not permitted to use our Services. If Aspenex Ltd becomes aware that personal data has been collected from individuals under the specified age, we will take all reasonable steps to promptly delete such information.

User Rights Under GDPR

In accordance with applicable legislation, end-users have the right to exercise one or more of the following options:

- **Right of Withdrawal:** The end-user has the absolute right to withdraw consent for the collection and processing of their data at any time, without providing a reason.
- **Right to be Forgotten:** The end-user has the complete right to request the permanent deletion of their data from all media we control, without the need to justify their request. The user acknowledges that by exercising this right, the provision of our services may be limited or completely discontinued.
- **Right of Rectification and Access to Data:** The end-user has the full right to review the data we have collected at any time. Additionally, the user may request corrections or updates to their data (e.g., changes in contact information such as phone number or email address).

Exercising Your Rights

To exercise any of the rights outlined above, users may contact the Data Controller directly by reaching out to us via email at support@tradeversity.pro.

Updates to This Privacy Notice

We may periodically revise this Privacy Policy. If any significant changes are made, we will inform you through email, a notice on the Services, or by any other means required by applicable law. A summary of the key changes will also be provided. Unless otherwise specified, these updates will be effective from the date of publication.

To the extent permitted by law, continued use of the Services after the changes take effect will constitute your implicit acceptance of the revised Privacy Notice and the obligations arising therefrom. The updated version will replace all prior versions of the Privacy Notice.

Interpretation

All capitalized terms not defined in this Policy shall be interpreted as outlined in Aspenex Ltd's Terms and Conditions. Any versions of this Privacy Policy provided in languages other than English are offered solely for convenience.

This Policy was last updated on 30 September 2024.