

## **DATA GATHERING AND STORING**

### **Gathering, storing and using statistical data when browsing the Site**

Whenever a Client is browsing the Site or downloading data, the Company automatically gathers and stores the following data about that Client:

- IP-address (IP-address is a number that is automatically issued to any computer when going online or an Internet-domain number which a Client uses to browse the Site),
- data on the operating system and the browser type used to navigate the Site,
- time and date of visiting the Site,
- list of pages viewed within the Site,
- website address visited prior to the Site navigation start (if any).

The abovementioned data are only used as the statistical information about the Client's actions on the Site, they do not reveal the identity of the Client and are only required to determine the number of visitors and the variety of tools they use, as also for improving the Site itself. The company does not monitor or collect specific information about the Client.

The site uses identification files («Cookie»-files) for the distinctive recognition of the Client among the other users of the Site, when subsequently visiting the Site. «Cookies» are files that are stored on your computer that allow us to recognize you as Bilderlings Client, when you return to Bilderlings website using the same computer and browser. This contributes to creating a positive opinion about the experience of use of the Site by the Client, and also helps to improve the Site. A client can disable loading Cookie-files (if permitted by the browser), but this may limit some of the Site's functionality for the Client.

To learn more about the use of Cookie-files, you may follow this link: [www.aboutcookies.org](http://www.aboutcookies.org). Our Site may contain electronic images known as web-beacons and interesting fact tags, which help determine the number of users that have visited certain pages of the Site.

### **Collecting Client personal data:**

The Company collects and processes the following personal data of the Client:

- Registration data and documents that are handed in by the Client prior to cooperation. These are acquired when the Client registers on the Site, fills in the registration blank and submits all the necessary additional documents to the Company,
- Client data and any documents that are submitted by the Client through his Merchant Panel of the Site or are in any way processed by his Merchant Panel.
- Message archive storing all forms of communication with the Client, including mails, e-mails, facsimile correspondence and phone call records.

## **Storing Client personal data:**

The Company stores all the personal data provided by the Client on the secure data server. All such data is encrypted using the SSL to protect it against interception, and the Company takes all measures necessary to secure all sensitive information regarding the Client.

Taking in account that no data transfer through the Internet can be completely secure. The Company is not able to guarantee total data security; therefore, any data transfer is fraught with the risk for the Client.

## **General purposes of the Client's personal data use.**

The company uses the Client's personal data for the following purposes:

- When making a decision about creating the Merchant Panel for the Client and about the beginning of cooperation with the Client after receiving the corresponding request from the Client,
- When identifying and studying the Client according to the corresponding law procedures to prevent legalization of an illegally acquired funds or terrorism funding,
- When fulfilling the obligations arising from contracts made between the Company and the Client,
- When answering the Client's inquiries and appeals,
- When providing the Client with information, wares or services that he asks of the Company, or those that are viewed by the Company as useful or interesting for the Client, when informing the Client about all the data changes, ware and service assortment changes of the Company and any special propositions of the Company and its partners,
- When aligning the Site and Merchant Panel content with the Client expectations, creating content relevant for the Client, ensuring the most effective use of the Site and the Merchant Panel on the Client's computers and mobile device, as well as providing the Client with access to certain components of both the Site and the Merchant Panel.

When applying for the Merchant Panel setup and beginning to cooperate with the Company, and as long as the Merchant Panel stays active, the Client willingly allows for the Company to process the Client's personal data for the purposes described in this Policy as defined in the regulations covering the prevention of legalization of illegally obtained money and financing of terrorism, as well as other Company policies and procedures developed in accordance with the above regulations.

When applying for the opening of the Merchant Panel and beginning to cooperate with the Company, and as long as the Merchant Panel stays active, the Client also willingly allows for the Company to process the Client's personal data for communicating with the Client and sending the Client any necessary notifications from the Company and its partners, including marketing and advertising materials.

## **The disclosure of the Client's personal data to third parties**

The Company may disclose the Client's personal data to third parties in the following cases:

- If the Company is obliged to reveal or use the personal data of the Client in order to comply with regulations, at the request of the competent institutions,
- If the Company or the Company's assets are subject to the acquisition by any third party;
- If such disclosure is necessary to fulfill the Client's request;
- If some of the Company's services require the services of a third party, the third party will be provided with only the personal data of the Client, which are necessary for the given services.

## **Client's access to his personal data**

The Client's right to access, change and delete his personal data can be used in accordance with the requirements of the law applicable and the GDPR. The Company has the right to restrict the Client's access to his data if obliged to do so on the basis of the requirements of the law applicable and the GDPR.