### **PRIVACY POLICY**

## FOR THE **ICEROCKDEV.COM** WEBSITE

#### **I. DEFINITIONS**

The following terms are used in this Privacy Policy (hereinafter referred to as the Privacy Policy):

**Website Administration** (hereinafter referred to as the Website Administration) means Ice Rock Caucasus LLC (Yerevan, Yekmalyan Avenue, 6, Armenia), which is the owner of this Website.

**Website** means the website located online at <u>https://icerockdev.com/</u> and used by Ice Rock Caucasus LLC.

**Personal Data** means any information relating to an identified or identifiable person (the Personal Data subject), directly or indirectly.

**Personal Data Processing** means any action (operation) or a combination of actions (operations) performed with Personal Data with or without the use of automation, including collection, recording, systematization, accumulation, storage, clarification (update, amendment), extraction, use, transfer (distribution, provision, access), anonymization, blocking, removal, or destruction of Personal Data.

**Personal Data Privacy** means that the Operator or anybody else accessing Personal Data must prevent its distribution without consent of the Personal Data subject or no other legitimate reason for that.

User means any person using the Website.

**Cookies** refer to a small piece of data sent by a web server and stored on the User's computer that the web client or web browser sends to the web server each time during an HTTP request when attempting to open a page of a relevant website.

**IP address** means the unique network address of a node in a computer network based on the IP protocol.

### **II. GENERAL PROVISIONS**

2.1 By using the Website, the User agrees to this Privacy Policy and the terms of processing the User's Personal Data.

2.2. If he/she does not agree to the terms of this Privacy Policy, he/she must stop using the Website.

2.3. This Privacy Policy applies to the Website only. The Administration has no control over and will not be responsible for the websites of third parties, to which you can navigate through the links available on the Website.

2.4. The Website Administration does not verify the data provided by a Website User. The Administration assumes the User provides sufficient and complete Personal Data.

2.5. If the User provides third-party data on the Website instead of his/her own data, he/she must obtain the prior consent of that third party for their data to be recorded on the Website.

# **III. PRIVACY POLICY SUBJECT-MATTER**

3.1 This Privacy Policy establishes the Website Administration's obligations regarding the non-disclosure of the Personal Data provided by the User on the Website and ensuring Personal Data protection.

3.2 Personal Data that can be processed under this Privacy Policy are provided by the User by filling out a feedback form and include the following information:

- User's name

- User's phone number

- email address (e-mail)

3.3 The Personal Data specified in paragraph 3.2 are subject to secure storage and non-disclosure unless otherwise provided herein.

## IV. PURPOSES OF COLLECTION, MANNER, AND TERMS OF PROCESSING USER'S PERSONAL DATA

4.1 The Website Administration may use the User's Personal Data for:

- Communicating with the User for the purpose of discussing cooperation and providing services to the User in which he/she is interested.

- Maintaining communication with the User, if necessary, including sending notifications, requests, and information related to the use of services, provision of services, as well as processing requests and applications from the User.

- Ensuring the Personal Data provided by the User is correct and complete.

4.2 Processing of the User's Personal Data shall be performed for an unlimited period of time, in any lawful manner, including processing in Personal Data information systems with or without the use of automation.

4.3 During the processing of Personal Data, the following actions can be performed: collection, recording, systematization, accumulation, storage, clarification (updating, amendment), extraction, use, blocking, deletion, and destruction.

4.4 The User's Personal Data may be transferred to the authorities on the grounds and in the manner prescribed by the legislation of the Republic of Armenia.

4.5. The Website Administration cannot disclose the User's Personal Data to third parties without prior written permission of the User. Also, the Administration cannot sell, exchange, publish or otherwise disclose the User's Personal Data, except as required by law. In the case of the Personal Data loss or disclosure, the Website Administration shall immediately inform the User of the loss or disclosure of Personal Data.

4.6 The Website Administration takes the necessary organizational and technical measures to protect the User's Personal Data from unauthorized or accidental access, destruction, amendment, blocking, copying, distribution, as well as from any other unlawful action by third parties: provides an internal check of data collection, storage, processing, and security; provides physical security of the data by preventing any unauthorized access to the technical systems that ensure the Website's operation and in which the Operator stores the data; provides access to the User's data to Operator's employees or authorized persons on the need-to-know basis in order to perform their duties directly related to the provision of services to the User, as well as the operation, development, and improvement of the Website.

4.7 The Website uses Cookies and other technologies to track the use of the Website's services.

This information is necessary to optimize the Website's technical performance and improve the quality of the services provided. The Website automatically records information (including the URL, IP address, browser type, language, date, and time of the request) about each Website's visitor. The User has the right to refuse to provide his/her Personal Data when visiting the Website or to disable Cookies. In this case, some of the Website's features and services may not work properly.

4.8. The privacy terms stipulated in this Policy apply to all the information that the Website Administration can obtain about the User while he/she is browsing and using the Website.

4.9. The User has the right to:

- Demand from the Website Administration to keep his Personal Data up-to-date, block or destroy them if the Personal Data are incomplete, outdated, inaccurate, illegally obtained, or are

not required for the stated purpose of processing, as well as to take legal actions to protect his/her rights.

- Receive information concerning the processing of his/her Personal Data;

- Withdraw his/her consent for the Personal Data to be processed.

4.10. Withdrawal of the User's consent for the Personal Data to be processed can be made by the User by sending an appropriate written (printed on a tangible medium and signed by the User) notice to the Website Administration. The Website Administration is obligated to cease the processing of Personal Data and destroy them within the timeframe established by law.

4.11. The Website Administration is obligated to block the Personal Data of the respective User during the inspection from the moment the application or request is made by the User or his/her legal representative or the authorities for the protection of the data subjects' rights, should any incorrect Personal Data or unlawful acts be detected.

## V. OTHER TERMS

5.1 The Website Administration has the right to make changes to this Privacy Policy without the User's consent.

5.2 The new Privacy Policy becomes effective upon its posting to the Website unless stipulated otherwise by the new Privacy Policy.

5.3 The current Privacy Policy can be found at *icerockdev.com*.