

# Privacy Policy

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Econocom, a legal entity incorporated under the laws of France at 40 Quai'de Dion Bouton, 92800 Puteaux, France under registration number 326 966 777 (“Company”, “we”, “our” and “us”), is the owner of the website <https://asocks.com> (the “Website”) and a system that allows you to browse the Internet by redirecting users’ communications through other users’ devices (all together, the “System”). We care about your privacy and have created this Privacy Policy to help you (“User”, “Customer”, “You”) make decisions about your use of the System.

THIS PRIVACY POLICY IS A LEGALLY BINDING AGREEMENT BETWEEN YOU AND US. BY ACCESSING AND USING THE SYSTEM, OR PROVIDING INFORMATION TO US IN OTHER FORMATS, YOU AGREE AND ACCEPT THE TERMS OF THIS PRIVACY POLICY AS AMENDED FROM TIME TO TIME AND CONSENT TO THE COLLECTION, USE AND TRANSFER OF YOUR PERSONAL DATA FOR PROCESSING AS DESCRIBED IN THIS PRIVACY POLICY.

The definitions provided in the Terms of Service available on the Website shall apply to this Privacy Policy unless otherwise stated. In addition to this Privacy Policy, please review the Terms of Service, which are incorporated herein by reference. To the extent not expressly set forth in this Privacy Policy, the Parties shall be governed by the Terms of Service.

For purposes of the Privacy Policy, “Personal Data” or “Personal Information” shall mean any information identifying or relating to a specific individual that the Customer provides to the Company and/or that the Company collects about the Customer and/or information that the Company receives from third parties. The definition of Personal Data also includes information referred to as “personally identifiable information” or “personal information” under applicable data privacy laws, rules or regulations, including GDPR and CCPA.

## **PERSONAL DATA PROVIDED AND PROCESSED**

The Company is responsible for the processing of Personal Data that the Customer contributes to the System and for Personal Data that the Company collects in other ways in regard to the Service.

We may collect and process the following types of information:

**Non-Personal Information.** We collect non-personal information about your use of the System to enable us to provide the Service and continually improve it, for security reasons and to enable us to audit and track usage statistically. This is non-identifiable and non-identifiable information that is generated as a result of user actions. Such non-personal information may include the following information: browser type, web pages you visit, time spent on those pages, time and date of access, any non-persistent identifiers, session information collected through cookies and similar technologies.

**Personal Information.** This is information that may be private or confidential, identifies or may identify you. The personal information we collect and store includes your IP address, permanent online identifiers (your full name and email address if you provide us with this information (when you register or contact us through the ‘contact us’ option), payment and billing information (if you purchase any data plan) or other information we may request from time to time as will be necessary to provide the services.

**Personal Information from Third-Party Applications.** The Company may also receive Customer Personal Information from third party applications, including Payment Processors involved in servicing the System. This implies that any information provided by Customer to Third Party Applications in accordance with this Privacy Policy may also be shared with the Company and further processed and stored by the Company.

If we merge non-personal information with personal information, we shall consider the combined information to be Personal Information. This Privacy Policy, as set out above, governs and describes the collection, processing and use of Personal Information.

For the avoidance of any doubt, Customers' activity when using Residential Proxies is not recorded, which means that we are not aware of the web pages visited by Customers and any activity on such web pages.

## **Personal data and information provided by the Customer**

You may provide Personal Data when You:

1. **Use the Website.** The Customer provides Personal Data during Registration, using the Account and functionalities of the Website. Such Personal Data may include:
  - Email address (Login);
  - Password;
  - Information about Customer’s cryptocurrency wallet, which is used for changing off the Fees and transfer the amounts due to the Customer as a refund and/or under Referral Program;
  - Transactions information;
  - Username under third-party account used for registration (Google, Facebook and etc.);
  - E-mail address under third-party account;
  - Any other information under the third-party account that is available and can be transferred according to the regulations of such third parties.
2. **Use Third Parties Applications**, including Payment Processors, which may request You to provide the following Personal Data in order provide services enabling Customers to pay the Fees to the Company:
  - Details of Your card or cryptocurrency wallets;

- Any other information required for the billing (this may include identification documents, including image in photo, copies of any other documents necessary for identification purposes, information deemed necessary to comply with third parties' legal obligations under applicable financial or anti-money laundering laws (if applicable in any jurisdiction)).

For avoidance of any doubt, all matters relating to data flow, processing, use and storage of Personal Data provided by the Customer to the third parties are reflected in respective privacy policies with such third parties. The Company therefore has no responsibility or liability for the activities of these third parties.

**3. Communicate to the Company:** When You choose the “Contact us” option we may ask for and collect the following information:

- Full name;
- Phone number;
- Additional contact information;
- Any other information that we need to help with your request.

Please note that the Company shall not intentionally process any special categories of Personal Data (including any information about your health, race, religion, political views, etc.). The Company kindly recommends the Customer to remain cautious when communicating this data and using the System, on websites (forums, comments, etc.) and elsewhere on the Internet. The Company also does not knowingly collect or allow the receipt of Personal Data from Customers under the age of 18. If the Company discovers that the Company holds Personal Data relating to the Customer under 18 years of age, the Company will promptly delete the Personal Data from the Company's records. If the Customer has reason to believe the Company holds Personal Data relating to a Customer under 18 years of age that is not permitted, please contact the Company at email specified in section 10 of this Privacy Policy.

## **LEGAL BASIS AND USE OF PERSONAL DATA**

### **Legal basis of personal data**

Personal Data is processed and stored only in compliance with the applicable data protection legislation and by relying on one or more of the following lawful grounds:

<b>Legal Basis</b>	<b>Explanation</b>
Contractual obligations	Personal Data shall be processed to carry out the Company's obligations to maintain the System and render respective services arising out from the Terms of Service entered into between the Company and the Customer.

Legal obligations	The Company can process Customer's Personal Data, if it's required by law, specifically in order to assist any authority with their investigation as it may be required by law, to detect and prevent any fraud or other illegal / prohibited activities, to comply with applicable financial or anti-money laundering laws (if applicable in any jurisdiction).
Legitimate Interest	The Company can use Customer's Personal Data to monitor, analyze and improve the System, the Website's performance and functionalities.
Consent	By accepting the Terms of Service, the Customer expressly consents to the processing of Personal Data specified in this Privacy Policy in the ways and for the purposes set out herein.

If the Customer has provided consent to the processing of Personal Data, the Customer may withdraw such consent at any time. Please note, however, that under certain circumstances the Company may continue processing even if consent is withdrawn, if one of the other legal grounds described above applies.

### **Use of personal data**

The Company processes the Customer's Personal Data because the Company's purpose is to enable the Customer to use the System. The Company shall endeavor to make the System efficient and convenient. The Customer's Personal Data may be used in one or more of the following ways:

- To identify the Customer, so the Customer can log in the Account;
- To carry out our obligations arising out from the Terms of Service;
- To communicate with the Customer regarding the System, including sending information such as confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages;
- To notify the Customer about any changes to the System, the Terms of Service or other important matters related to the use of the System;
- To protect against any fraudulent, unauthorized or illegal activity;
- To operate, develop and improve the System;
- For statistical analysis;
- To conduct advertising and marketing activity;
- To conduct surveys and research;
- To administer the Account and for internal record keeping;
- To contact the Customer on other matters.

## **SHARING CUSTOMER'S PERSONAL DATA**

Personal Data may be transferred to the following categories of processors of Personal Data:

- Companies providing technical support for the System, including server and hosting companies;
- Companies providing analytical services, advertising partners and other companies related to the improvement of the System;
- Payment Processors;
- Governmental authorities or legal advisors in case criminal or improper behavior is suspected;
- Persons/companies with whom the Company enters into a business transaction or is negotiating a business transaction involving the sale or transfer of all or part of the Company's business or assets. Such transactions may include any mergers, financings, acquisitions, and bankruptcy transactions or proceedings;
- Auditors and other examination organizations;
- Other entities if necessary for the proper provision of services to the Customer and/or if required by the Company pursuant to law or an order of an authority.

The Company may transfer the Customer's data to the Company's counterparties (partners, branches, etc.) in different countries. The Customer's Personal Data may be stored, transferred and otherwise processed in countries outside the Customer's country of residence, which are countries that are part of the EEA or have received adequacy recognition by the European Commission, as well as countries that have not received adequacy recognition by the European Commission.

The Company shall protect Personal Data when it is transferred to recipients outside the EEA and takes all steps reasonably necessary to ensure that Personal Data is processed securely in accordance with this Privacy Policy. However, the Customer acknowledges that it understands and accepts that these countries may have different laws that provide a lower level of protection for Personal Data and that such Personal Data may become subject to disclosure laws and requirements in those countries, including disclosure to governmental authorities, regulatory agencies and individuals, as a result of a relevant governmental or regulatory request, court order or other similar process. For the avoidance of doubt, by accepting this Privacy Policy, Customer agrees that Personal Data may be transferred to a country that has not been recognized as adequate by the European Commission.

## **THIRD PARTIES AND THEIR PRIVACY POLICIES**

The Company's website may contain links to other third-party applications that are not controlled or operated by the Company. Therefore, the Company cannot be responsible for the protection and privacy of any information that the Customer provides while visiting

such third-party applications, and their sites and platforms are not governed by this Privacy Policy.

## **SECURITY**

In order to prevent unauthorized access or disclosure, the Company uses effective physical, electronic and managerial procedures to ensure the security of Personal Data. The Company makes every effort to protect the Customer's Personal Data, but cannot guarantee the security of information transmitted to the Site. However, once the Company has received the Customer's Personal Data, strict procedures and safeguards will be used to prevent unauthorized access.

The Company also cannot guarantee that loss, misuse, unauthorized acquisition, or alteration of Customer's Personal Data will not occur. The Customer confirms that when registering on the Website it is vital to choose a password of sufficient length and complexity, not to disclose login and password to any third parties.

## **CUSTOMER'S RIGHTS**

Taking into consideration the differences in data protection laws that may apply to the Customer due to the Customer's nationality, place of residence and other factors, generally data protection laws provide the data subject (the Customer) with the following data protection rights that apply to this Privacy Policy and the Company's processing of Personal Data:

1. **Right to Information.** The Customer has the right to request information about the scope of Personal Data processed by the Company by giving written notice.
2. **Right to access.** The Customer has the right to receive one (1) copy of the Personal Data being processed without charge. The Company shall charge a fee for subsequent copies requested.
3. **Right to rectification.** The Customer has the right to rectify inaccurate Personal Data concerning the Customer via a written request.
4. **Right to erasure** (“right to be forgotten”) and restriction of processing. The Customer has the right to request deletion or restriction of processing and the right to object to processing on the basis of legitimate interests in certain circumstances, unless the Company has a contrary obligation under applicable law. In these cases, the Company may cease to allow the use of the System if this is no longer possible, so please take this into account when deciding how to exercise these rights.
5. **Right to portability.** The Customer is entitled to exercise the right to data portability, which means the right to receive Personal Data and transfer it to another controller.

6. **Other rights.** The Customer has other rights in accordance with this Privacy Policy and applicable laws.

The Customer acknowledges and understands that if the legislation applicable to the Customer does not guarantee the Customer any of the rights listed above, the Company is not obliged to comply with such a request.

In order to exercise the data processing rights, set out in the table above, the Customer should send a request to the Company via the Company's support email listed in section 9 and follow the instructions received, or send such a request to the Company directly via the Customer's Account settings (if any).

Please note that in some cases, in order to fulfil the request, the Company may ask the Customer to provide the Company with some additional information if it is necessary to identify the Customer (as stated in paragraph 1 of the Privacy Policy). The Company undertakes to fulfil the Customer's request at no additional charge within one month of receipt, but in some cases this period may be extended for a further two months. The Company has the right to refuse to fulfil the Customer's request or to charge a reasonable fee if the Customer's request is manifestly unreasonable or excessive.

## **HOW LONG PERSONAL DATA WILL BE PROCESSED**

The Company shall retain any Personal Data of the Customer that it collects for as long as the Customer's Account is active in accordance with the Terms of Service and/or for as long as it is necessary for the provision of the System Services to the Customer and for as long as the Company has a lawful basis for processing the Personal Data. The Company also erases the Customer's Personal Data once the purposes for which the Company collected such data have been fulfilled.

Please consider that the Company has the right to continue to retain some of the Customer's Personal Data even after complying with the Customer's request to delete such Personal Data in the following cases:

- The Company has the lawful basis to further process the Customer's data other than a consent from the Customer. As instance, the Company may be required to do so in order to comply with applicable laws (as instance, for tax or accounting reasons, know-your-customer, anti-laundering or other legal requirements and obligations);
- The Customer's Personal Data has been anonymized in such a way that it cannot be used to identify the Customer and therefore no longer constitutes personal identifiable Customer data.



## **DIRECT MARKETING RIGHTS AND OPT-OUT OPPORTUNITIES**

As the Company has the right to send direct marketing communications or emails to the Customer (as set out in clause 2.2), the Customer has the right to unsubscribe from each of such communications by exercising the unsubscribe right as set out below.

The Customer acknowledges that opting out of receiving direct marketing communications from the Company does not affect the Company's right to send the Customer other communications, emails or otherwise contact the Customer as permitted under this Privacy Policy.

If the Customer wishes to refuse to process Personal Data for certain purposes, the Customer should send a request to the Company at the contact email address provided in Section 9 of this Privacy Policy.

Please take into consideration the following:

- Refusal of certain processing purposes may result in the inability to provide certain (or even all) functionalities of the System to the Customer partially (or at all). The Company will make every effort to minimize such limitations of the System;
- The possibility of refusal to process Personal Data applies only to the processing of the Customer's Personal Data on the basis of the Customer's consent (as specified in clause 2.1.), unless otherwise expressly provided for by applicable law.

The Company reserves the right to process Personal Data based on the other lawful basis such as contractual obligations, legitimate interest or legal obligation, if available by virtue of applicable law, even if the Customer has opted out such processing according to the provisions of this Privacy Policy.

## **CONTACT INFORMATION**

If the Customer has any questions about this Privacy Policy or about use of Personal Data, then the Customer may contact the Company at **support@ASocks.com**.

## **AMENDMENTS**

The Company may change this Privacy Policy at any time. If the Company makes any changes, it will change the last update date set forth above. The Customer agrees to independently verify such changes. Any updates to this Privacy Policy shall be effective from the date of publication on the Site (date of the last update).

In case of substantial changes, the Company reserves the right to update the Privacy Policy subject to a relevant update notice and refreshing the Customer's consent.

Unless the Customer agrees with the revised version of the Privacy Policy, the Company reserves the right to suspend use of the System which requires the Customer's data processing by the Company.