

Privacy Policy of “PanaceaPay” Payment Service

1. General Provisions

1.1 This Privacy Policy of “PanaceaPay” Payment Service (hereinafter referred to as “Policy”, “Privacy Policy”) is developed in accordance with the provisions of the Constitution of the Russian Federation, the Federal Law dated July 27, 2006 N 149-FZ “On Information, Information Technologies and Information Protection”, the Federal Law dated July 27, 2006 N 152-FZ “On Personal Data” (hereinafter referred to as “Federal Law”) and other regulatory legal acts, in order to ensure proper protection of information about Users, including their personal data, from unauthorized use of the Website.

By performing any actions on the use of the Site, the User expresses its consent to the terms of this Policy. If the User does not agree with the terms of this Policy, the use of the Site shall be immediately terminated.

1.2 The following terms are used in this Privacy Policy:

Company - VERDANT PAYMENT SERVICES PROVIDER L.L.C, registered under the laws of the UAE at PR1005 Port Saeed, UAE, reg. No. 2269164, license number No. 1336397.

Website - an Internet resource, which is a set of information and intellectual property objects contained in the information system (including computer program, database, graphic design of the interface (design), etc.), access to which is provided from various user devices connected to the Internet by means of special software for viewing web pages (browser) at <https://panaceapay.com/>.

Website Administration - employees authorized to manage the Website, organizing and (or) carrying out the processing of personal data, as well as determining the composition of personal data of Website Users subject to processing, the purposes of processing and collection of personal data.

User - a natural person, user of the site services, subject of personal data, who provided personal data.

Payment Service Terms of Use - an agreement in the form of a public offer regulating the relations between the Company and the Website User (hereinafter referred to as the “Agreement”).

Personal Data - any information relating directly or indirectly to a certain or definable natural person (subject of personal data), which by itself or in combination with other information at the disposal of the site, allows to identify the user's identity.

Processing of personal data - any action (operation) or set of actions (operations) performed with or without the use of means of automation with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

1.3 This Privacy Policy establishes the procedure for obtaining, protection, storage, processing and transfer of personal data of Users, applies to all information that the Site Administration may obtain about Users during their use of the Site.

1.4 This Privacy Policy does not apply to other sites and does not apply to third party sites. Administration of the site is not responsible for the sites of third parties, to which Users can go through the links available on the Site.

1.5. Personal data of the User, authorized for processing within the framework of this Privacy Policy, is provided by the User by filling in the feedback form on the Site, etc. and includes:

- the User's full name;
- contact phone number of the User;
- electronic mail (e-mail) address;
- location address,
- gender, date of birth,
- details of electronic means of payment (number, expiration date, CVV/CVC code), etc.

1.6 Any other personal information not specified above (browsers and operating systems used, etc.) is subject to secure storage and non-dissemination, except as provided for in clauses 5.2. and 5.3. of this Agreement. 5.2. and 5.3. of this Privacy Policy.

Other information about Users processed by the Company includes:

- standard data automatically received by the http server when accessing the Site and subsequent actions of the User (host IP address, type of operating system, visited pages of the Site), information containing the history of visits to the Site;
- information automatically received when accessing the Site using bookmarks (cookies);
- information provided or created by Users on the Site: photos, audio recordings, videos, comments ("Content");
- coordinates defining location (geolocation data).

All personal data about Users the Administration of the site can receive only from them and only with their consent. Consents of Users on the use of personal data are stored in the Company in electronic form.

Personal data of Users of the site are confidential information and can not be used by the Administration of the site or any other person for personal purposes.

1.7 The purposes of processing the personal data of the Users of the site:

- fulfillment by the Company of its obligations to the Website User;
- provision of information of notification or marketing nature;
- collection of statistical data necessary for improvement of the Site and its services, anonymously and in generalized form;
- fulfillment of the requirements of the legislation of the Russian Federation;
- processing of requests/complaints of Users.

1.8 The Website Administration provides Users with free access to their personal data, including the right to receive copies of any record containing their personal data, except as provided by law.

1.9. The Administration of the site develops measures to protect the personal data of the Users of the site.

2. Collection, storage, processing and transfer of personal data of Users of the site

2.1 Processing of personal data of Users of the site is carried out exclusively for the purposes specified in clause 1.7 of this Policy. Personal data is provided by the User voluntarily and independently. Collection of personal data and other information of the User is carried out on the Site when using the Site, its services, as well as in the future when the User at his/her own initiative provides additional information

about himself/herself. By virtue of Article 6 of the Federal Law dated 27.07.2006 No. 152-FZ "On Personal Data" a separate consent of the User to the processing of his personal data is not required.

2.2 The User understands and agrees that the information on the Site, posted by him/her about himself/herself, may become available to other Users of the Site and Internet users, may be copied and distributed by such users.

2.3 The personal data of the Website Users are stored electronically in the personal data information system of the Website, as well as in the archive copies of the Website databases in anonymized form.

2.4 The User realizes that some types of information transferred by him/her to other Users cannot be deleted by the User himself/herself.

2.5 When storing personal data of the Users of the site, organizational and technical measures are observed to ensure their safety and exclude unauthorized access to them.

2.6 Administration of the site may transfer personal data of Users to third parties only for the purposes of execution of the Agreement, in cases provided by them, as well as at the request of competent state authorities in order to comply with the current legislation of the Russian Federation.

2.7 When transferring personal data of the Users of the site Administration of the site warns the persons receiving this information that this data can be used only for the purposes for which they are reported.

2.8 The transfer (dissemination, provision, access) of personal data authorized by the subject of personal data for dissemination shall be terminated at any time at his/her request. The personal data specified in this requirement may only be processed by the operator.

2.9 All information on the transfer of personal data of Users of the site is taken into account to control the legality of the use of this information by the persons who received it.

2.10. In order to improve the quality of service and to ensure the possibility of legal protection, the Administration of the site has the right to store log files on the actions performed by Users within the framework of the use of the site.

3. Rights and obligations of the Site Administration

3.1 Administration of the site has the right to establish requirements to the composition of personal data of Users, which must be provided for the use of the site, while the Administration of the site is guided by this Policy, the Agreement, the Constitution of the Russian Federation, other Federal Laws.

3.2 The site Administration does not verify the accuracy of personal data provided by Users, believing that they act in good faith and keep information about their personal data up to date, except when such verification is necessary for the purposes of fulfillment of the Company's obligations to the User.

3.3 Administration of the site is not responsible for the voluntary transfer by Users of their contact information, password or login to third parties.

3.4 Administration of the site does not collect and process personal data of Users about their political, religious and other beliefs and private life.

3.5 Administration of the site takes measures to ensure the protection of personal data of Users of the site from unauthorized use or loss in the manner prescribed by the legislation of the Russian Federation.

3.6 The site Administration shall be obliged to take measures necessary and sufficient to ensure the fulfillment of obligations provided for by Federal Laws and regulatory legal acts adopted in accordance with them. The site administration independently determines the composition and list of measures necessary and sufficient to ensure the fulfillment of these obligations. Such measures include:

1) issuance of documents defining its policy with respect to the processing of personal data, local acts on the issues of personal data processing, as well as local acts establishing procedures aimed at preventing and detecting violations of the legislation of the Russian Federation, eliminating the consequences of such violations;

2) application of legal, organizational and technical measures to ensure the security of personal data;

- 3) internal control and (or) audit of compliance of personal data processing with the Federal Law No. 152-FZ "On Personal Data" and regulatory legal acts adopted in accordance with it, requirements to personal data protection, the site's policy on personal data processing, local acts of the site;
- 4) assessment of the harm that may be caused to personal data subjects in case of violation of the Federal Law N 152-FZ "On Personal Data", the correlation between this harm and the measures taken by the site to ensure the fulfillment of obligations under the Federal Law.

4. Rights of users to protect their personal data

4.1 In order to ensure the protection of their personal data stored on the website, users have the right to:

- to receive full information about their personal data, its processing, storage and transmission;
- determine their representatives for the protection of their personal data;
- to demand the exclusion or correction of incorrect or incomplete personal data, as well as data processed in violation of this Policy and the laws of the Russian Federation;
- to demand from the Website Administration to notify all persons to whom incorrect or incomplete personal data of Users were previously communicated about all exceptions, corrections or additions made to them.

4.2 Users have the right to independently limit the collection of information by third parties, as well as at any time to change, delete or supplement their personal data.

4.3 If Users believe that the processing of their personal data is carried out in violation of legal requirements or otherwise violates their rights and freedoms, they have the right to appeal the actions or inaction of the Website Administration to the authorized body for the protection of the rights of subjects of personal data or in court.

4.4 Users have the right to edit the personal data provided by them during registration or authorization in their personal account at any time.

4.5. Users can send their questions to the Company, including those related to the use of their personal data, in writing to the address: PR1005 Port Saeed, UAE, or by e-mail specified on the Site-----.

4.6 The User is obliged to independently take measures to ensure confidentiality of credentials (login and password), and may not transfer them to third parties, except for persons acting in the interests of the User in cases provided by law.

5. Procedure for destruction, blocking of personal data

5.1 In case of detection of unlawful processing of personal data at the request of Users, the Administration of the site is obliged to block the unlawfully processed personal data related to these Users from the moment of such request for the period of verification.

5.2 In case of revealing inaccurate personal data at Users' request, the Website Administration is obliged to block personal data related to these Users from the moment of such request for the period of verification, if the blocking of personal data does not violate the rights and legitimate interests of users or third parties.

5.3 In case of confirmation of the fact of inaccuracy of personal data, the Administration of the site on the basis of information submitted by Users or other necessary documents is obliged to clarify personal data within 3 working days from the date of submission of such information and remove the blocking of personal data.

5.4 In case of detection of unauthorized processing of personal data carried out by the site, the Site Administration is obliged to stop unauthorized processing of personal data within a period not exceeding 3 working days from the date of such detection.

5.5 The site Administration is obliged to notify Users about the elimination of violations or destruction of personal data.

5.6 If Users withdraw their consent to the processing of their personal data, the Website Administration shall cease processing and, if the retention of personal data is no longer required for the purposes of personal data processing, destroy the personal data within a period not exceeding 30 days from the date of receipt of the said withdrawal.

6. Responsibility for violation of the norms governing the processing and protection of personal data of the Users of the Website

6.1 Persons guilty of violating the norms governing the receipt, processing and protection of personal data of Users of the site, shall be brought to disciplinary, material, civil, administrative and criminal liability in accordance with the procedure established by the current legislation of the Russian Federation.

6.2 Moral damage caused to the Users of the site as a result of violation of their rights, violation of the rules of personal data processing established by the Federal Law N 152-FZ "On Personal Data", as well as the requirements for the protection of personal data. as well as the requirements for the protection of personal data established in accordance with the Federal Law, shall be compensated in accordance with the legislation of the Russian Federation. Compensation for moral damage shall be made regardless of compensation for property damage and losses incurred by Users.

7. Period of storage and processing of information about Users

7.1 Information about Users is subject to storage and processing by the Company:

- during the entire term of the Agreement between the Company and the User;
- except for special cases stipulated by the Agreement, within 5 (five) years after the end of the year in which the Agreement between the Parties terminated for any reason. The specified period is provided by the Federal Law dated 06.12.2011 No. 402-FZ "On Accounting", processing of personal data is necessary for the Company to confirm the previously established financial relationship between the Users and the Company, as well as to confirm the fact of rendering and volume of services previously rendered by the Company in favor of the User.

7.2 The Company draws the attention of Users, as well as persons who have previously been denied access to the Site and services due to their violation of the terms of the Agreement, that they have the right to delete their account on the Site. In case of account deletion, personal data of such persons are removed from public access, cease to be available for other Users, as well as when search engines issue search queries, but remain in the Company's database for the period specified in this paragraph.

8. Validity and modification of the Personal Data Processing Policy

8.1 This Policy may be changed or terminated unilaterally by the Website Administration without prior notice to the User. The new edition of the Policy comes into force from the moment of its posting on the website, unless otherwise provided.

8.2 The current version of the Privacy Policy is available on the Site.

8.3 The rules stipulated by this Policy come into force for the User from the moment of its accession to the Agreement and are valid for an indefinite period of time.