# **Privacy and Cookie Policy**

# **Cookie Policy**

**SunContract OÜ ("SunContract")** uses cookies on its website. By accessing the Website and using any services through it, you consent to the use of cookies. Our Cookie Policy explains what cookies are, how we use cookies, how third parties we may partner with may use cookies on the website, your choices regarding cookies and further information about cookies.

## What are cookies?

Cookies are small pieces of text sent by your web browser by a website you visit. A cookie file is stored in your web browser and allows the Service or a third-party to recognize you and make your next visit easier and the Service more useful to you. Cookies can be "persistent" or "session" cookies.

## How SunContract uses cookies?

We use cookies for the following purposes:

Session cookies are mandatory for proper operating and functioning of applications on the website. Persistent cookies enable the transformation of information of each website visitor to web server. We also use cookies to provide analytics, to store your preferences and to enable advertisements delivery, including behavioural advertising.

## Third-party cookies

In addition to our own cookies, we may also use various third-party cookies, including Google Analytics, Facebook, LinkedIn as well Google Ads to report usage statistics of the Website, deliver advertisements and so on.

### What are your choices regarding cookies?

If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser. Please note, however, that if you delete cookies or refuse to accept them, you might not be able to use all the features we offer, you may not be able to store your preferences, and some of our pages might not display properly.

# **Privacy Policy**

Users who simply visit the **SunContract** website are not required to provide any personal information. The acquired information in such cases might include the IP address, the date, the time and the type of browser. This data is not sufficient to identify the User; however, it may be used to improve the **SunContract** website, its products and services or their presentation.

For the purposes of subscription to our newsletter, we might ask you to provide us with your valid email address.

The purpose of collecting this data is to provide you with a secure, smooth, efficient, and customized experience of email subscriptions.

We may also use the information to contact Users and prospects to further discuss their interest in our company, the services we provide, ways we can improve our Services, and send information such as announcements of promotions and events regarding **SunContract** or our partners.

We do not distribute or share any User's personal information, except as outlined in this Privacy Policy, or as may be required by law and when we believe that disclosure is necessary to protect our rights and/ or to comply with a judicial proceeding, court order, or legal process. We may disclose your personal information to third parties in the following events and with the following persons:

- With Google Analytics (for the purpose of analysing the visits to our site).
- if **SunContract** or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers and Users will be one of the transferred assets.
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation.

- With specialized third-party service providers, we utilize for operating the newsletter (such as Mailchimp).
- to keep you up to date on the latest service announcements, updates, special offers or other information that we think you'd like to hear, either from us, our business partners or third parties.
- in order to enforce or apply our **Terms and Conditions for the use of Website** and any other relevant agreements.
- to protect the rights, property, or safety of **SunContract**, our customers, or others; which includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction; and
- as otherwise outlined in this Privacy Policy.

We assure that your personal data will not be disclosed to third parties without obtaining your prior consent, unless we are required by law, or if we must disclose the data to enforce our claims to third parties, who are obligated to maintain secrecy.

**SunContract** employs organizational methods and processes as well as technical measures and processes, to protect your data from loss, theft, misuse, unauthorized access or dissemination, alteration and/or destruction. We strive to employ strict security and cyber-security measures to protect your personal data.

### Your rights

You can easily opt out of receiving newsletter communications by clicking the hyperlink at the bottom of each email message, or at any time by contacting us at privacypolicy@suncontract.org

You are entitled to review, correct, or amend your personal data, or to delete that data where it is inaccurate. You are also entitled to receive a copy of the personal data undergoing processing. Upon request, we will provide you with information about whether we hold or process any of your personal information, whether on behalf of a third party or otherwise. To request this information, please contact us at privacypolicy@suncontract.org

We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. We use a third-party platform host, who hosts the forms on our site, they do not have any access to the personal information that you submit on our Website.

We have established internal policies for the deletion of data from Users following the termination of a User's subscription to the newsletter. Personal data whose retention period has expired or whose purpose of processing has been served, are deleted, destroyed, blocked or anonymized.

You may ask us not to process your personal data for a particular purpose, or to access such information, by contacting us at privacypolicy@suncontract.org. Please note, however, that you shall remain liable for any fees or costs incurred at the time of the withdrawal of your consent to process your personal data.

#### **Third Party Websites**

The Website may, from time to time, contain links to other third-party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies (including, as the case may be, landing pages of other **SunContract** products or services; i.e. other than **SunContract Platform**) and that we do not accept any responsibility or liability in respect of these policies. Please check these policies before you submit any personal data to these websites.

#### Safeguarding your data

The data that we collect will be stored on the cloud based in the European Economic Area ("EEA").

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. The communication internally between our servers (e.g. between application server and database) is handled via secure socket layer ("SSL") to provide AE-256 encryption and all information between our servers and your browser is handled via SSL (up to 256-bit encryption, depending upon your browser), providing an industry-standard level of protection for data in-transit. You should always make sure that your browser can validate the Website's certificate. All encrypted data is signed using a message authentication code (MAC) so that the underlying value cannot be modified once encrypted.

Unfortunately, the transmission of information via the internet is not completely secure and we cannot guarantee the security of your data transmitted to the Website, although we will do our best to protect your personal data. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

### Social Media Widgets

Our Website may include Social Media Features, such as the Facebook button and Widgets, such as the Share this button or an interactive mini programs that run on our site. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Website. Your interactions with these Features are governed by the privacy policy of the company providing it. In such federated identity login, the data required for registration (e.g., the e-mail deposited with Facebook/ Google/ LinkedIn, some additional information that is available in your Facebook/ Google/ LinkedIn public profile) will be transferred from your Facebook/ Google/ LinkedIn profile to **SunContract** may also be transferred back from our website to Facebook/ Google/ LinkedIn. The data transferred by Facebook/ Google/ LinkedIn can be stored and processed by **SunContract**.

When you visit one of our web pages with a corresponding plug-in, the browser builds a direct connection with the Facebook servers, which happens even if you are not a Facebook user. The contents of the plug-in are delivered from Facebook right on your browser and embedded in the web page. **SunContract** has no influence on the range of data that Facebook collects. In any case, Facebook may collect the information that you have visited a respective web page via **SunContract**. For Users registered and logged into Facebook, Facebook can associate the visit of the website to your Facebook account. When you interact with the plug-ins by clicking the "Like" button or by leaving a comment, or by sharing, for example, the relevant information is delivered directly from your browser to Facebook account before visiting **SunContract** website. For further information on the function and scope of the data collected by Facebook, as well as the use of your data, please see Facebook's Privacy Policy.

### **Changes to this Privacy Policy and Contact Information**

We may update this Privacy Policy from time to time. If we do, you will be notified when you first visit our website after the change. You can also revisit this page if you wish to keep yourself informed.

If you have questions, concerns or suggestions related to our Privacy Policy or our privacy practices you may contact us at: privacypolicy@suncontract.org

For any questions regarding your rights or if you believe that someone has provided us with your personal information and you would like to request that it be removed from our database, you can contact our data protection officer via this email: privacypolicy@suncontract.org

#### Date of Last Revision: December 31, 2020