

PRIVACY AND PERSONAL DATA PROTECTION POLICY

of OCTAVA IT Limited Liability Company

Effective date: October 17, 2025

1. GENERAL PROVISIONS

OCTAVA IT Limited Liability Company registered and operating in accordance with the legislation of Ukraine (hereinafter referred to as the **Company, we, our**) undertakes to protect the personal data of all persons visiting the website: www.octava-it.com (hereinafter referred to as the Website) and is committed to safeguarding the confidentiality of individuals' personal data (hereinafter referred to as the User, you, your).

1.1. Definitions

Personal data means information or a set of information about an individual who is identified or can be specifically identified.

Processing of personal data means any action or a set of actions such as collection, registration, accumulation, storage, adaptation, modification, updating, use, dissemination, anonymization, or destruction of personal data.

Personal data owner means OCTAVA IT Limited Liability Company.

1.2 Purpose of this Policy

This Privacy and Personal Data Protection Policy (hereinafter referred to as the **Policy**) stipulates:

- the procedure for processing personal data by the Company;
- legal grounds for processing personal data;
- types of personal data collected;
- purposes of using such personal data;
- the Company's interaction with third parties;
- security measures for protecting personal data;
- conditions for access to personal data;
- the rights of data subjects;
- contact information for exercising users' rights.

1.3 Scope of Application

This Policy applies to all personal data processed by the Company related to:

- Website visits;
- inquiries submitted via contact forms;
- provision of services and execution of agreements;
- participation in Company events;
- employment and cooperation.

2. INFORMATION WE COLLECT

2.1 Personal Data Provided Voluntarily

We collect only personal data that you voluntarily provide to us when:

- filling out contact forms on the Website;
- registering to receive information about products and services;
- requesting consultations with technical specialists;
- submitting a CV for employment;

- entering into and executing agreements;
- corresponding via email;
- participating in marketing campaigns and events.

2.2 Types of Personal Data

Personal data can include:

- **Contact information:** full name, position, company name, phone number, email address;
- **Business information:** details about the company, activity area, product/service needs;
- **Employment information:** CV, education, work experience, qualifications;
- **Contractual information:** details required to conclude agreements, payment data (transmitted via secure channels).

2.3 Automatically Collected Information

When visiting the Website, the following information is collected automatically:

- IP address;
- browser type and operating system;
- visited pages;
- duration of your visit on each page;
- links you click;
- date and time of your visit;
- device information.

3. LEGAL GROUNDS AND PURPOSES OF PROCESSING PERSONAL DATA

3.1 Legal Grounds

The Company processes your personal data on the following grounds:

Execution of the Agreement: processing is required to execute the Agreement to which you are a party or to take measures at your request prior to entering into the Agreement (e.g., supply of equipment, provision of IT services, technical support).

Legitimate interests: processing is required to exercise the Company's legitimate interests provided that such interests do not violate your rights and freedoms, including:

- improving the quality of services;
- internal administration;
- information security;
- fraud prevention;
- marketing and performance analysis.

Consent: when processing does not fall under other legal grounds, we request your explicit consent.

Compliance with legal obligations: processing is required to comply with the legislation of Ukraine (tax and accounting regulations etc.)

3.2 Purposes of Using Personal Data

Personal data is used for:

Primary purposes:

- providing information about the Company's products, services, and solutions;

- processing requests and providing consultations;
- entering into and executing agreements;
- providing technical support and maintenance services;
- reviewing CVs and organizing employment.

Additional purposes:

- sending news, promotional materials, and information about new opportunities;
- conducting marketing research;
- improving the Website functionality;
- analyzing the use of products and services;
- fulfilling corporate social responsibility obligations.

3.3 Personal Data Retention Period

We retain personal data for:

- the period required to achieve the purpose of processing;
- periods required by the Ukrainian legislation (e.g., accounting records – at least 3 years);
- until you withdraw your consent or request deletion of your data.

4. COOKIES AND SIMILAR TECHNOLOGIES

4.1 What are Cookies?

Cookies are small text files stored on your device when visiting the Website. They allow the Website to remember information about your visit.

4.2 Types of Cookies We Use

Strictly necessary cookies: ensure the basic Website functioning (navigation, access to secure sections). The Website won't operate properly without them.

Functional cookies: remember your preferences and settings to make your experience more convenient.

Analytical cookies: collect information about how the Website is used (e.g., visited pages, session duration) to help us improve its performance.

Marketing cookies: used to display relevant ads, limit the number of ad impressions, and assess the efficiency of marketing campaigns.

4.3 Managing Cookies

You can configure your browser to reject cookies via the Settings or Tools menu.

Please note that disabling cookies can limit certain functionalities of the Website.

More information on cookies management is available at: www.allaboutcookies.org

4.4 Google Analytics

We use Google Analytics to analyze Website traffic.

Terms of Use: <http://www.google.com/analytics/terms/ru.html>

Privacy Policy: <http://www.google.com/analytics/learn/privacy.html>

4.5 Web Beacons

Web beacons are small graphic elements embedded in Website pages or emails that allow collecting the following information:

- IP address;
- time of page view or email opening;
- browser type;

- interaction with content (link clicks).

4.6 Log Files

We automatically collect information in the form of log files to:

- troubleshoot errors;
- improve performance;
- ensure Website security.

5. YOUR RIGHTS

According to the legislation of Ukraine on personal data, you have the following rights:

5.1 Right to Access

You have the right to obtain confirmation of processing your personal data and access to such data. A request for access is referred to as the Data Subject Access Request.

The first provision of information in response to such a request is free of charge.

5.2 Right to Correction

If your personal data is inaccurate or incomplete, you have the right to request their correction or completion.

5.3 Right to Deletion (Right to Be Forgotten)

You have the right to request the deletion of your personal data if:

- the data is no longer required for the purposes of processing;
- you have withdrawn your consent, and there is no other legal ground for processing;
- the data was processed unlawfully;
- deletion is required to comply with the legal obligation.

5.4 Right to Restrict Processing

You can request the restriction of the processing if:

- you dispute the accuracy of personal data;
- the processing is unlawful, but you do not want the data to be deleted;
- the Company no longer needs the data, but you require it to defend legal claims.

5.5 Right to Object

You have the right to object to the processing of your personal data, in particular:

- for direct marketing purposes;
- based on the Company's legitimate interests (if your interests prevail over such interests).

5.6 Right to Withdraw Consent

If processing is based on your consent, you can withdraw that consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before such withdrawal.

5.7 Right to Data Portability

You have the right to receive your personal data in a structured, commonly used format and to transmit it to another controller.

5.8 How to Exercise Your Rights

To exercise any of these rights, please send your request to:

- **Email:** info@octava-it.com
- **Postal address:** OCTAVA IT, 74A Kostiantynivska Str., Kyiv, 04080, Ukraine

We will confirm receipt of your request within 3 business days and respond within 30 days. In complex cases, the response period can be extended to 60 days with mandatory notification.

6. DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

6.1 General Principles

The Company does not disclose your personal data to third parties without your consent, except for cases stipulated by this Policy or the legislation of Ukraine.

6.2 Categories of Data Recipients

Subsidiaries and affiliates: within the OCTAVA IT group of companies to ensure a unified customer service system.

Service providers: IT service providers, hosting providers, as well as mailing and technical support companies operating on our behalf under agreements ensuring personal data protection.

Business partners: equipment manufacturers only to the extent required to fulfill contractual obligations and warranty services.

Professional advisors: legal, accounting, and auditing firms providing professional services to the Company.

Public authorities: courts, law enforcement, and tax authorities – in cases provided for by law or upon official request.

6.3 International Data Transfer

In cases where personal data is transferred outside Ukraine, the Company ensures an adequate level of protection by:

- signing standard contractual clauses;
- obtaining your explicit consent;
- applying other mechanisms stipulated by the legislation.

6.4 Reorganization or Sale

In case of the merger, acquisition, reorganization, or sale of the Company's assets, your personal data can be transferred to the new owner as part of the transferred assets.

7. INFORMATION SECURITY AND DATA PROTECTION

7.1 Organizational Measures

The Company implements the following organizational security measures:

- appointing responsible persons for personal data protection;
- developing internal data protection policies and procedures;
- training employees in personal data handling rules;
- restricting access to personal data based on the need-to-know principle;
- requiring employees to maintain confidentiality.

7.2 Technical Measures

We apply the following technical safeguards to ensure data security:

- encryption of data during transmission (SSL/TLS);
- network and system protection using firewalls;
- antivirus and malware protection;
- regular data backups;
- unauthorized access monitoring;
- access control through authentication and authorization mechanisms.

7.3 Limitation of Guarantees

Despite all efforts, no system for data transmission over the Internet or electronic storage system can guarantee absolute security. We take every possible effort to protect your data but cannot guarantee absolute safety.

7.4 Security Incidents

In case of a personal data security breach that can pose a risk to your rights and freedoms, we will notify you and the relevant supervisory authority in accordance with legal requirements.

8. SOCIAL MEDIA WIDGETS AND APPLICATIONS

8.1 Integration with Social Media

The Website can include social media widgets and buttons (such as Facebook, LinkedIn, etc.) allowing you to share content.

8.2 Data Processing by Social Media

When using these features:

- social media can collect information about your visit to the Website;
- privacy policies of respective social media platforms apply;
- the Company does not control and is not responsible for the processing of data by social media.

8.3 Links to Third-Party Websites

The Website can contain links to third-party websites. The Company is not responsible for privacy policies or practices of such websites. We recommend reviewing the privacy policy of each website before providing any personal data.

9. CHILDREN'S POLICY

9.1 Age Restrictions

The Website is not intended for children under the age of 14. We do not knowingly collect personal data from individuals under 14 years old.

9.2 Actions upon Discovery

If we become aware that we have received personal data from a person under 14 years of age without parental or legal guardian consent, we will take measures to delete such information immediately.

9.3 Notifications from Parents

If you believe that your child has provided us with personal data, please contact us at info@octava-it.com, and we will delete this information.

10. CHOICE AND UNSUBSCRIBING FROM MARKETING NEWSLETTERS

10.1 Voluntary Data Provision

You are not obligated to provide us with personal data. However, refusal to do so can limit your ability to receive information about our services, products, and promotions.

10.2 Unsubscribing from Marketing Newsletters

If you have subscribed to receive electronic newsletters, you can unsubscribe at any time by:

- clicking the Unsubscribe link in the email;
- sending a request to info@octava-it.com;
- changing your preferences in your profile (if available).

We will process your request within **10 business days**.

10.3 Mandatory Notifications

Unsubscribing from marketing newsletters does not affect mandatory notifications related to the execution of agreements (e.g., order confirmations, delivery updates, or technical support).

11. AMENDMENTS TO THIS POLICY

11.1 Right to Introduce Amendments

The Company reserves the right to periodically update this Policy to reflect:

- legislative changes;
- new data processing methods;
- security improvements;
- expansion of services.

11.2 Notification of Amendments

In case of significant amendments,

- the updated Policy will be published on the Website;
- the effective date will be indicated at the beginning of the document;
- if necessary, we will send you a separate email notification.

11.3 Continued Use of the Website

Your continued use of the Website after the effective date of the amendments constitutes your acceptance of the updated Policy. If you do not agree with the amendments, please stop using the Website and contact us to request the deletion of your data.

11.4 Review of the Policy

We recommend periodically reviewing this Policy to stay informed about protecting your personal data.

12. CONTACT INFORMATION

12.1 General Questions

If you have any questions regarding this Policy or the processing of your personal data, please contact us:

OCTAVA IT LLC

- **Address:** 74A Kostiantynivska Str., Kyiv, 04080, Ukraine
- **Email:** info@octava-it.com
- **Website:** www.octava-it.com

12.2 Responsible Officer for Personal Data Protection:

If you have any questions related to exercising your rights or complaints regarding the processing of personal data, please contact:

Email of the Responsible Officer: info@octava-it.com (please indicate 'Personal Data Protection' in the subject line)

12.3 Response Timeframes

- **Confirmation of receipt:** within 5 business days
- **Response to request:** within 30 days from the date of receipt
- **Complex requests:** up to 90 days with mandatory notification of the extension period

12.4 Right to File a Complaint

If you believe that the processing of your personal data violates the legislation of Ukraine, you have the right to file a complaint with:

The Commissioner for Human Rights of the Verkhovna Rada of Ukraine

- Address: 21/8 Instytutaska Str., Kyiv, 01008, Ukraine
- Phone number: +380 44 253-86-03
- Website: www.ombudsman.gov.ua

13. ADDITIONAL PROVISIONS

13.1 Language of the Document

This Policy is drafted in Ukrainian. In the event of translation into other languages, the Ukrainian version shall prevail in case of any discrepancies.

13.2 Applicable Legislation

This Policy is governed by the laws of Ukraine, in particular:

- The Law of Ukraine On Personal Data Protection;
- The Law of Ukraine On Information;
- Other regulatory legal acts.

13.3 Part of the Terms of Use

This Policy is an integral part of the Website's Terms of Use: www.octava-it.com.

13.4 Validity of Other Provisions

If any provision of this Policy is found to be invalid or unenforceable, it shall not affect the validity of the remaining provisions.