

PRIVACY POLICY

Implemented: June 1, 2022

Data protection is of a particularly high priority for the management group of [Webs.li](#) sites (hereinafter referred to as "Website") and projects related to [Webs.li](#) – [Lnd.li](#), [Donate.re](#) and services related thereto.

When the processing of your personal data is necessary and if there's no basis for such processing, we will obtain your consent.

Processing of personal data, including your name, address, email address, or phone number will always be in line with of the Law of Ukraine "On Protection of Personal Data" No. 5491-VI dated November 20, 2012, the General Data Protection Regulation (GDPR), and in accordance with United States data protection regulations applicable to Webs.li.

Via this data protection declaration, we are informing the general public of the nature, scope, and purpose of the personal data we collect, use, and process. Furthermore, you are informed, by this data protection declaration, of the rights to which you are entitled. We recommend that you read this Privacy Notice in full to ensure you are fully informed.

As the data controller and data processor, [Webs.li](#) has implemented numerous technical and organizational measures to ensure complete protection of your personal data through the Website. Since Internet-based data transmissions may have security gaps, absolute protection is not guaranteed. This is why, every data subject is free to transfer personal data to us via all available means, e.g. by email or phone support.

Name and Address of the controller

Controller for the purposes of the General Data Protection Regulation (GDPR) is:

LLC «Science company AXONAX»

Project: «Webs.li», «Lnd.li» «Donate.re»

Registration number 42762123

4-A Lviv Square str, Kyiv, Ukraine, 04053

Contact email: [regtoevent @ gmail.com](mailto:regtoevent@gmail.com)

What does Webs.li do?

Webs.li is a platform for creating a mini landing page (biolink) for creators to accept support from their audience and share exclusive content, to your latest video, article, recipe, tour, store, website, social post, and other content. We connect your audience to wherever you are online (social networks, sites, messengers), and make your content more discoverable and easier to manage.

Our Websites are located at <https://webs.li> and other digital properties <https://lnd.li> та <https://donate.re> where you can also create your bio link (together our "Platform") provides information about us and allows individuals and businesses to sign-up as **Platform Users** (to create a personalised, easily-customisable page), as **Subscribers** (to subscribe to and follow Platform Users)

The pages that Webs.li are able to create using the Platform are referred to in this Privacy Notice as "User Profiles". User Profiles are accessible by the public.

Webs.li not a payment processor, Webs.li facilitates payments directly between Platform Users of the Platform via third party payment providers such as PayPal, Stripe and WayForPay. Before creating an account or making a payment please take a moment to read the privacy policies of these payment providers:

- **PayPal** who's Privacy Policy can be found at <https://www.paypal.com/en/webapps/mpp/ua/privacy-full>
- **Stripe** who's Privacy Policy can be found at <https://stripe.com/privacy>
- **Stripe** who's Privacy Policy can be found at <https://wayforpay.com/en>

Webs.li also connects to third party services to perform certain functions. Before using Webs.li please take a moment to read the privacy policies of these third party services.

Users can authenticate (log in to Webs.li) via the following services:

- **Google** who's Privacy Policy can be found at <https://policies.google.com/privacy>. Revoke access at any time directly in your Google account at <https://myaccount.google.com/permissions>
- **Facebook** who's Privacy Policy can be found at <https://www.facebook.com/privacy/explanation>

Users can connect to Chat and set up Stream Alerts via:

- **YouTube** who's Privacy Policy can be found at <https://policies.google.com/privacy>. Revoke access at any time directly in your Google account at <https://myaccount.google.com/permissions>.
- **Twitch** who's Privacy Policy can be found at <https://www.twitch.tv/p/en/legal/privacy-notice>
- **Telegram** who's Privacy Policy can be found at <https://telegram.org/privacy>

Platform Users can configure the collection of analytical data from their biolink using:

- **Google Tag Manager** who's Terms of use and Privacy Policy can be found at <https://marketingplatform.google.com/about/analytics/tag-manager/use-policy/>
- **TikTok** who's Privacy Policy can be found at <https://www.tiktok.com/legal/privacy-policy-row?lang=en>
- **Google Analytics** who's Terms of use and Privacy Policy can be found at <https://marketingplatform.google.com/about/analytics/terms>
- **Facebook** who's Privacy Policy can be found at <https://www.facebook.com/privacy/explanation>

Webs.li facilitates a direct relationship between Users (creators, author) and Subscribers. Subscribers include: followers, sponsors, donors, subscribers, and buyers on Platform. Individual Users receive certain contact information about Subscribers such as email addresses and transaction information such as delivery addresses and phone numbers when required for shipping providers and as such Users themselves are responsible for their own lawful processing of information made available to them by the service.

What personal information do we collect and why?

The personal information that we may collect about you broadly falls into the following categories:

- **Information you provide voluntarily**

When you sign up to become a Webs.li User use or interact with our services, we will ask you to provide your email address, name for your User Profile and to generate a hashed password. We use this information to create your personal account, where you can make all the necessary settings of your User Profile. If you're on a paid plan, we'll also ask for your full name, phone, billing email address, and store your payment information for your regular subscription.

If you are a Subscriber (visitor to the User Profile), a User might request that you provide your email address, mobile number, date of birth or age, or other personal information, at the User's discretion, in order to access elements of a User Profile (such as locked content). We may use the results of such access (i.e. successful or unsuccessful access attempts) to produce aggregated statistics for our own internal purposes and to improve the Platform services.

Those who engage in transactions with Platform are asked to provide additional information, including as necessary the personal and financial information required to process those transactions. For example, to pay for order in the User's online store or to donate to him as a content author.

You may also provide personal information voluntarily if you respond to our surveys, marketing materials, or through your participation in trade promotions and competitions we or Platform Users may run from time to time.

To opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails or SMS we may send you or completing our Data Request Form.

- **Information that we collect automatically**

When you visit our Platform, use our services, interact with a User Profile, respond to a survey or participate in a trade promotion we collect certain information automatically from your device. In some countries, including countries in the European Economic Area and UK, this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location), time zone, usage data, diagnostic data and other technical information. We may also collect information about how your device has interacted with our Platform, service or User Profiles, including the pages accessed and links clicked.

Collecting this information enables us to better understand you, where you come from, and what content is of interest to you. We use this information for our internal analytics purposes, to improve the quality and relevance of our Platform and services, to provide hints and tips to our Webs.li Users and to make recommendations of Webs.li Profiles or our other websites you might be interested in viewing.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading “How do we use cookies” at <https://webs.li/docs/en/Cookie.pdf>.

- **Information that we obtain from users who referred to chat support**

Name, email address, information about the device and browser you use, chat transcript, and other personal information you provide us during our chat. We may request additional documentation from you during our chat to verify your identity. We may use this information to respond to your requests or correspondence, to provide customer service (or for statistical purposes), analysis for management purposes in order to administer the website, improve products/services, send technical notices/updates, security alerts, changes in policy notifications, administrative messages, so we could to prevent fraud, breach of policies/terms, and threats or harm.

- **What personal information do we collect about you from third parties?**

Even though we’re collecting personal information directly from you, occasionally we may collect certain information about you from other sources.

Financial and/or transaction details from payment providers (in order to process the transaction).

Third Party Services like Google, Facebook, TikTok may provide us with certain information about you when you link/connect/login to any Third Party provider. The amount of information may vary and can be/is controlled by that service provider or by you via privacy settings controls available in the account settings of that service provider.

From Third Parties we may obtain demographic data, fraud detection information, combine it with the info we have about you, to confirm your identity, these can be identity verification services used for fraud warning purposes.

Even though we’re collecting personal information directly from you, occasionally we may collect certain information about you from other sources.

- **Children’s data**

All Webs.li websites, as well as blogs and services, are not intended to be used by children under 14 years old. No one under age 14 years old can provide personal information to or on our websites. We’re not collecting information from children under 14 years old. If you’re under 14 years old you’re not allowed to use any of our websites, buy products available on Webs.li, comment blog posts, make social media posts or provide any personal

information about yourself including your name, address, phone number, email. If you are a parent or guardian and you are aware that an individual (of whom you are a parent or guardian) under the Age Limit has provided us with personal information, please contact us.

Why do we collect your personal information?

In general, we will use the information we collect for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your personal information. These include:

- To provide and deliver the Platform services and to assess, maintain and improve the performance and functionality of the services.
- To ensure the Platform services are relevant to you and your device, to notify you about changes to the services, and to deliver targeted and/or localised content based on your user data, location and preferences.
- For consumer research and to allow you to participate in surveys or interactive features of the Platform services when you choose to do so.
- To provide customer support and to process and respond to a request, complaint or Intellectual Property Report or Counter Notice that you may have made.
- To monitor the usage of the Platform services and to detect, prevent and address technical issues.
- To process payments for Paid Plan Users.
- To conduct business planning, reporting, and forecasting.
- To deliver promotional materials, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted out of receiving such information.
- For the administration of our business including for fulfilling and exercising our obligations and rights, exercising or defending legal claims, to comply with our legal obligations and law enforcement requests, and managing the relationship with you.
- To verify your identity and to detect fraud and potential fraud, including fraudulent payments and fraudulent use of the Platform services.
- To include Platform User content as part of our advertising and marketing campaigns to promote Platform.

Who may we disclose your personal information to?

We may disclose your personal information to the following categories of recipients:

- individuals, for instance employees, or legal entities empowered by Webs.li, who need it to perform their tasks and duties to provide you with proper services; third party services providers (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Platform), or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information. We also facilitate third party payment providers and this is set out in more detail below;
- to the extent we introduce social media log-ins in the future, we may provide personal data to the relevant social media provider to facilitate such log-in;
- to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to an actual or potential buyer (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice;
- to any other person with your consent to the disclosure.

In order to facilitate paid products and/or services within the Platform, we use third party payment processors. We will not store or collect your payment card details. That information is provided directly to our third party

payment processors whose use of your personal information is governed by their privacy policies and their own terms and conditions. These payment processors adhere to the standards set by payment card industry data security standards (“PCI-DSS”) as managed by the Payment Card Industry Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

Where do we transfer and/or store your personal information?

The main production of Webs.li is in Ukraine, but the company uses cloud server storage in France.

How long do we keep your personal information?

Your private information is kept on our servers as long as it’s needed to provide you with our services and to be able to comply with the legal obligations.

If you don’t want us to store your personal information, you have the right to get it erased, but in this case, we’ll have to close your Webs.li account.

All information about deleted accounts is kept on our servers so we could use it for our legitimate business interests: to comply with the law, prevent fraud, resolve disputes, troubleshoot problems, assist with investigations, enforce the terms of use and/or take other actions permitted by law. The information we retain will be handled in accordance with this Privacy Policy.

Marketing choices regarding your personal information

By registering on the site, accepting the terms of use of the site and the terms of this policy, you agree that we will send you marketing materials that will include information about products, services, and discounts that may be interesting for you.

If you decide not to receive such email notifications you can easily opt-out using the unsubscribe option or contact us via email.

Google Analytics

Webs.li websites are using Google Analytics, a web analytics service designed by Google, Inc. (“Google”). Google Analytics software uses cookies to analyze users’ behavior. All data (i.e. your activity within Webs.li websites) is gathered by cookies and stored on Google servers in the United States.

Google in its turn uses this data to evaluate user behavior in general, compile reports for site managers as well as providing data to services relating to website activity and internet usage. Google may transfer various data to Third Parties where required to do so by law, or where such Third Parties process the information on Google’s behalf.

In no way, Google will associate your IP address with any other data held by Google. In case you don’t want to provide Google with the browsing data you can block the use of cookies via your browser settings. More information on Google analytics opt-out:

<https://www.google.com/intl/en/policies/privacy/>, and <http://www.google.com/analytics/terms/us.html>.

Google Analytics is explained under the following link <https://www.google.com/analytics/>.

Facebook

We may use Facebook's web analytics services, such advertising products include, but are not limited to, the Facebook pixel, the Conversions API (formerly known as the Server API), the Facebook SDK for App Events, Offline Conversions, the App Events API, and the Offline Events API . Facebook software uses cookies to analyze user behavior. All data (i.e. your activity on Webs.li websites) is collected by cookies and stored on Facebook servers in the United States.

Facebook, in turn, uses this data to evaluate user behavior in general, and will transfer it to third parties (including advertisers). Additional information about the policy of processing personal data by Facebook tools at <https://www.facebook.com/legal/terms/businessstools>

Public information and Third Party websites

Social media platforms and widgets

On all biolink of the Platform, it is possible to place the functions of going to social networks, for example, the button Facebook, YouTube, Pinterest, Instagram and many others, with a complete list of which you can familiarize yourself with the personal account of the User Profile. When you go to these services, they can collect your data, may collect your data like IP address or place a cookie to your browser in order to gather statistical information about your interactions with our websites. Social media features are hosted both on a specific social media network.

Please be advised that any information you submit on these networks in public areas like comments can be easily read, collected or stored by all users of these networks. We are not able to control the actions of other users of these platforms, or actions of these platforms. Your activity with those features and/or platforms is governed by privacy policies of the companies that provide them.

Links to other websites

If you click on a link to a Third Party site, you will leave Webs.li and go to the site you selected. Since we can't control activities of Third Parties, we are not accepting responsibility for any use of your personal information by those parties. Please review the privacy policy any other service provider from whom you request services.

Routine erasure and blocking of personal data

The information controller shall store the non-public data just in the amount necessary to attain the aim of storage, or as this is often granted by European legislators in laws or rules to which the controller is subject.

If the storage purpose isn't applicable, or if a storage period prescribed by the European legislator or another competent instance expires, the non-public information will be blocked or erased.

Routine erasure and blocking of personal data

The information controller shall store the non-public data just in the amount necessary to attain the aim of storage, or as this is often granted by European legislators in laws or rules to which the controller is subject. If the storage purpose isn't applicable, or if a storage period prescribed by the European legislator or another competent instance expires, the non-public information will be blocked or erased.

How can you access and manage your personal information?

All personal information that we collect about you is available in your account or in our servers and available for you on demand. You have the right to make all the necessary edits and corrections of any errors available in this data.

You can require, erase it, or restrict its processing, also you can object the processing of your personal data based on a set of our legitimate interests, such as profiling for direct marketing, and cases where we've asked for your consent to process your data.

There're multiple situations when these rights can be limited. There's a number of cases when we can retain your information after you withdraw your consent.

Cases where we may require your personal information to be compliant with legal or contractual obligations. If you don't provide us with such data we will not be able to manage relationships with you. In all other cases providing requested information can be optional.

If it happens that you have some unresolved concerns you have the right to complain to the data protection authorities.

How is your personal information kept secure?

In order to keep your information secure, we're applying certain organizational measures to protect it against unauthorized or unlawful use and accidental loss or destruction.

- We share and provide access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible.
- To store your information we're using secure servers.
- We verify identity of all individuals who request access to private information before granting them with access.
- We use SSL-certificate encryption to protect the data transfer.

Make sure your information is safe and secured. We're not responsible if you try to circumvent privacy settings on our websites. In case we give you the password to certain parts of our website your responsible for keeping it safe. You must not share it with Third Parties especially comments, questions area since these areas can be viewed by any user of our websites.

Due to obvious reasons, we're not able to control users' actions on our websites. Which is why you need to share your information in public areas of our websites wisely, as we can't guarantee that your information won't be viewed by unauthorized parties. When you choose to share your information via a Third Parties website, you need to check the privacy policy of that website to be aware of their information management/protection practices.

Changes in our Privacy Policy

As the data controller and data processor, we reserve the right to change or modify this Privacy Policy at any time. In case some changes are applied, we will publish them in the Privacy Policy section. You will be notified when you go to our site that certain changes to our Policy were applied

Contact information

Depending on the context of personal information you provide, Webs.li is both data controller and data processor of your personal information under this policy. Webs.li is a processor of personal information submitted to the services or collected through the services on behalf of or at the direction of subscribers.

If you have any questions regarding this Privacy Policy, including processing of your personal information, or if you believe your privacy rights have been violated, please contact us via email. We will respond to all requests, inquiries or concerns within fifteen (15) days at regtoevent@gmail.com.

The legal basis for the processin

Law of Ukraine "On Protection of Personal Data" No. 5491-VI dated November 20, 2012

Art. 6(1) GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose.