

## **PRIVACY NOTICE FORM**

**This Privacy Notice Form (Privacy Notice) is intended to all Users (Data subjects) whose personal data are collected by Triggmine OU, in line with the requirements of the GDPR.**

### **RESPONSIBILITIES**

**Triggmine OU** is responsible for ensuring that this Notice is made available to Data subjects prior to **Triggmine OU** collecting and processing their personal data.

**Triggmine OU** is responsible for ensuring that this Notice is drawn to the Data subject's attention and their consent to the processing of their data is secured.

### **WHO WE ARE?**

Triggmine OÜ (Company/we/us),

Address: Estonia pst 5 Kesklinna linnaosa, Tallinn Harju maakond 10143.

E-mail: [support@triggmine.com](mailto:support@triggmine.com)

Tel. \_\_\_\_\_

### **WHO YOU ARE?**

An Individual (You) who intends to register on the Website and create an account on the Website on behalf of himself/herself or acting on behalf of the Clients or prospective Clients of the Company.

### **PERSONAL DATA WE COLLECT FROM YOU**

Through filling in the registering form, we offer You to provide Us with the following personal information on You:

**Name; Surname; E-mail.**

### **LAWFULNESS (CONSENT)**

The legal basis for processing for the personal data is consent which we are going to get from You through filling in the consent (registering) form at the following link.

If You fill in the consent (registering) form, this means that You understand and accept all conditions specified in this Privacy Notice.

### **WITHDRAWAL OF CONSENT**

You have a right to withdraw the consent You has provided us earlier at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. You may withdraw your consent through sending us the appropriate request at the following e-mail address [support@triggmine.com](mailto:support@triggmine.com) , herewith, the Form of the request is available at the following link: <http://triggmine.com/legal/Data-subject-consent-withdrawal-form.pdf> .

### **PURPOSES OF PROCESSING**

We process your personal data for the following purposes:

- to provide Services specified herein, the Company provides to the Clients, the respective Users act on behalf of;
- to be in touch with the Users by providing new features announcements and our advices of best practices;
- to be fast and close to the Users when they need to contact the Company's Support team;

- to collect statistics and analytics of active marketing campaigns of the Users or the Clients they act on behalf of, using Company's Services;
- to process your fee for using the Company's Services;
- to send activation e-mails to the Users during the registration on the Website;
- to send informational e-mails to the Users and the Clients they act on behalf of.

#### **SUBJECTS THE PERSONAL DATA MAY BE TRANSFERRED TO**

While processing your personal data, we transfer your personal data to the entities which act as the Company's processors. The Company's processors act exclusively on the basis of the Company's instructions. The specific of actions the Company's processors conduct can be found in the Privacy and Data Protection Policy at the following link:

<http://triggmine.com/legal/Privacy-policy.pdf> .

#### **THE COUNTRIES THE PERSONAL DATA MAY BE TRANSFERRED TO**

While processing your personal data, we transfer your personal data to the processors which are registered and located in the USA.

The Company transfers your personal data on the basis of an adequacy decision as its stipulated by the GDPR and EU Commission. Additional information regarding personal data transfer to the USA can be found in the Privacy and Data Protection Policy at the following link:

<http://triggmine.com/legal/Privacy-policy.pdf> .

#### **THE PERIOD OF STORAGE**

Taking into account the purposes of processing, the period of storage of the Users' personal data (period of storage) is 12 months since the date the data processing consent is duly obtained from the You.

#### **RIGHT OF ACCESS**

You have a right to know whether personal data concerning You are being processed and 2) if so, access such data with loads of additional stipulations stated in the *GDPR Article 15*.

#### **RIGHT TO RECTIFICATION**

When the personal data You provide us with are not inaccurate then, You are entitled to ask us to correct them indeed (*GDPR Article 16*).

#### **RIGHT TO ERASURE (RIGHT TO BE FORGOTTEN)**

You have a right to obtain from us the erasure of your personal data without undue delay and we shall have the obligation to erase your personal data without undue delay where the grounds, stated in the *GDPR Article 17 applies*.

#### **RIGHT TO RESTRICTION OF PROCESSING**

You have a right to limit processing of your personal data with several exceptions under the scope of the GDPR in particular stated in the *GDPR Article 18*.

#### **RIGHT TO BE INFORMED**

We are obliged to inform You what data are being collected, how they are being used, how long they will be kept and whether they will be shared with any third parties. This information must be communicated concisely and in plain language.

#### **RIGHT TO DATA PORTABILITY**

You are permitted to obtain and reuse your personal data for your own purposes across different services. This right only applies to personal data that You have provided to the Company by way of the consent.

## Triggmine OÜ

Estonia pst 5 Kesklinna linnaosa, Tallinn Harju maakond 10143

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### RIGHT TO OBJECT

You have a right to object the processing of personal data that are being processed by the Company. We must stop processing personal data unless we demonstrate compelling legitimate grounds for the processing that overrides the interests, rights and freedoms of the individual or if the processing is for the establishment or exercise of defense of legal claims.

### RIGHT NOT TO BE SUBJECT TO A DECISION BASED SOLELY ON AUTOMATED PROCESSING

You have a right to object to any automated profiling that is occurring without consent. Herewith, the You have a right your personal data are to be processed with the human involvement.

### COMPLAINTS

In the event that You wish to make a complaint about how your personal data are being processed by the Company (or by processors, described above), or how your complaint has been handled, You have the right to lodge a complaint directly with the supervisory authority or/and the Company.

The details for each of these contacts are:

<b>Supervisory authority:</b>
Estonian Data Protection Inspectorate 19 Väike-Ameerika St., 10129 Tallinn. Telephone (from abroad add +372) 627 4135.
<b>Company:</b>
Triggmine OÜ (Company/we/us), Address: Estonia pst 5 Kesklinna linnaosa, Tallinn Harju maakond 10143. E-mail: support@triggmine.com Tel. _____

All details of complaints lodging are specified in the Complaints procedure at the following link:

<http://triggmine.com/legal/Complaints-procedure.pdf> .

### PRIVACY AND DATA PROTECTION POLICY

Read more about how and why we use your data in Privacy and Data Protection Policy here:

<http://triggmine.com/legal/Privacy-policy.pdf> .

### APPROVAL

The Company has developed all internal documents to define roles among staff concerning the personal data processing within the Company, in particular responsible for approving and reviewing the legitimacy of this document is CEO Igor Solovyov.