

CONFIDENTIALITY POLICY

We pay special attention to protecting your personal information, and respect your rights. You are kindly requested to read the text below so that you understand why and what personal information we process, as well as what rights you are provided with.

WHILE USING THE PLATFORM AND CLICKING "ACCEPT" WHERE ASKED TO DO SO, YOU AGREE TO COMPLY WITH ALL TERMS AND CONDITIONS SET FORTH IN THIS POLICY.

You may not use the Platform if you do not understand this Policy or do not agree to all of its Terms and Conditions. If that is the case, do not click the Accept, Sign Up and/or other buttons meant to accept the Terms and Conditions hereof.

You are also requested to review the User Agreement located at: jobs.swg.io.

1. General Provisions

This Confidentiality Policy (the "Policy") has been designed in compliance with the legislation of Seychelles, in particular, the Civil Code, as well as with the [General Data Protection Regulation](#) dated April 27, 2016 No. 2016/679. The Policy applies in regards to relations arising while the SmartWorld Global Ltd. company ("SWG Ltd.") processes personal information of the Platform's Users and Visitors.

We will review the Policy regularly and may update it from time to time. If significant changes are made, these changes will be brought to the Users' attention no later than 5 days by placing a corresponding pop-up window on the Platform, as well as publishing a notice or by other means available to the User.

In case we want to use your personal data in a new, previously undefined way, we will contact you to provide you with information thereabout, and ask for your consent, where required.

The new version of the Policy will come into force from the moment of its publication on the Website.

If you are intended to file a formal complaint under this Policy, you are requested to contact our Confidentiality Officer at: support@jobs.swg.io. We will respond to your formal complaint within 10 business days upon its receipt.

If we fail to resolve your complaint satisfactorily, and you are in the European Union, you can file a complaint with your local data protection authority (DPA). The DPA list is located at: http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

2. Personal Data Collection and Processing

2.1. Personal Data Collection

We only collect the information that you provide to us. We do not collect any personal data on our own through other sources.

We may process the following information.

Data	Mandatory Provision	Provided at the User's Option
Account information	Name, Surname, password	Profile images, etc.
Contact information	email	Telephone number, social network information, etc.
Location information	Country	Other
Financial information	Personal cryptocurrency wallet information	Other
Professional information		Work experience, labour activity information, etc.
Other User identification information		Feedback on and citations of the User, photographs, sample works, etc.

2.2. Purposes of Personal Data Collection

We use the data collected to provide Users with an opportunity to use the Platform, in particular, to generate catalogs, and to arrange Profiles.

We may use your personal data for the following purposes:

- To process your registration;
- To sign, execute, amend and cancel public agreements published on the Platform;
- To provide you with technical and other support (feedback);
- To comply with legal and regulatory obligations;
- To manage and develop our business relations with you and, where applicable, with the corporation or other legal person that you represent;
- To control safety, to protect from malevolent, misleading, fraudulent or illegal actions and to hold liable persons responsible for such activities;
- To fulfil other purposes with your consent, unless you revoke your consent with such purposes.

WHILE PROVIDING YOUR CONSENT TO YOUR PERSONAL DATA PROCESSING, YOU CONSENT WITH THE FOLLOWING ACTIVITIES TO BE TAKEN WITH THE DATA: COLLECTION, SYSTEMATIZATION, STORAGE, MODIFICATION, USE, DEPERSONALIZATION, BLOCKING, DELETION, BOTH WITH AND WITHOUT THE USE OF AUTOMATION TOOLS. THIS CONSENT SHALL BE PROVIDED FOR A PERIOD UNTIL ITS REVOCATION.

In addition to the above purposes, personal data may also be used for scientific, statistical, analytical or other research purposes after a mandatory depersonalization of such personal data.

THE SERVICE IS DESIGNED FOR A WIDE RANGE OF USERS WHO HAVE REACHED THE AGE OF MAJORITY UNDER THE LAWS OF THE COUNTRY OF RESIDENCE.

2.3. Grounds for Personal Data Procession

The underlying grounds for our lawful processing of our Users' personal data shall include (but not limit to) the following:

- When the User has provided his/her consent (clicked the Accept, Sign Up button);
- When it is required in order to fulfil an agreement where the User is a party thereof;

- When such procession is required to comply with our legal obligations;
- When such procession is required to protect vital interests of our users or another private individual.
- When such procession is carried out in order to implement our lawful interests, unless these interests infringe upon the rights of our Users.

3. Data Storage

Unless you request us to delete certain information, we will only hold your personal data for as long as necessary to achieve the purposes it was collected for, including any legal and regulatory requirements, and ongoing fraud prevention, backup, and business continuity purposes, up to a maximum of 3 years.

4. Third Party Access to Your Personal Data

We shall be entitled to engage third parties in processing our Users' personal data in order to implement relevant purposes wherefore Users have provided their personal data.

As on **10.09.2024 (the information will be updated)** we do not transfer data to third parties. Should SWG Ltd. engage an authorized person to process personal data, the Policy will mandatorily provide the following information: the name and location of the authorized person, reasons for data processing, a list of data being processed, and a list of actions carried out with personal data.

We shall be also entitled to transfer your personal data to the appropriate third parties when we have reason to believe that we are obliged to do so based on the legislation in force.

5. Your Rights

Before submitting your personal data, you are requested to get acquainted with your rights.

- Compliant with the law, you have the right to request your information stored with us, and you can request to correct it if it is incorrect;
- Upon your consent to processing your personal data, you may revoke such consent at any time. Thereupon, processing will be terminated;
- If we process your personal data by consent, you can request to delete your data;
- You are entitled to request us to stop using your personal data for a certain period of time, if you think that there are no lawful grounds therefore;
- You are entitled to address us in order to learn what exactly we do with your personal data and to what extent we process it;
- In certain cases, you are entitled to request us not to take decisions that affect you when automatic data processing or profiling is used.

To request your personal data by email, regular mail or telephone, please use the contact information provided in the Policy.

We pay special attention to checking your request. Only you or the person you authorize to act on your behalf can make a request related to your personal data. To verify your request, you will need to provide us with sufficient information to confirm reasonably that you are the person whose personal data we have collected, or the person authorized to act on your behalf. We will use for verification only that personal information you provided in a verifiable request. We will not be able

to respond to your request or provide you with personal data if we are unable to confirm your identity or credentials.

6. Safety

We take a number of measures to protect your data; however, no security is guaranteed. SWG Ltd. shall take reasonable steps to protect information we collect and store about our Users. We maintain reasonable administrative, technical and physical safeguards designed to protect personal data we obtain from accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

7. Cookie File Procession

A “**cookie**” is a small text file that the Platform saves on your device during a session. It allows remember your actions and preferences. **These files identify you as a User; however, they do not identify you, and they are not your personal data.**

Some of the Platform's pages collect information using pixel tags and web beacons that are electronic images called single-pixel (1×1) or empty GIF images.

Cookie files do not directly affect the Platform operation, but help us to study Users' preferences, track the overall dynamics of interaction with the Platform and, as a result, improve the user experience in the future. We use different types of cookies for different purposes:

- Temporary cookie files: information is stored in the browser during a current session, and is deleted from the device after exiting the browser;
- Operational cookie files: they collect information about the User's operation of the Platform, for example, data on pages visited, the number of visits, their duration, browsers and operating systems employed;
- Functional cookie files: they allow remember the User's selected parameters (e.g., the name, network ID, language, country/area/region where the Visitor is located), and provide access to enhanced and personalized features and functions. These cookies can also be used to remember changes made by the Visitor to the text size, fonts and other customizable options at web pages;
- Analytical cookie files: these are used to improve the Platform operation quality by collecting information on the number of Users, sources of transition to the Platform, as well as the way Users operate the Platform (for example, which pages visitors most often go to);
- Advertising cookie files: these are used to limit the number of times a user views the same advertisements, as well as to evaluate advertising campaign effectiveness.

Cookie files are only saved on your device if you consent to it, except for cases when cookies are necessary immediately for the Website technical operation.

Cookie files are stored during 10 days.

You can manage cookies and/or delete them at your wish. You can switch off cookies in your browser settings or by clicking on the following links:

