

## PRIVACY POLICY

Last updated: April 22, 2025

At Affroom, we are committed to respect the privacy choices of our clients and Website visitors.

This Privacy Policy sets out how we collect, use and protect your data, and informs you about your rights concerning your personal data. This Privacy Policy applies where we are acting as a data controller with respect to your personal data and therefore determine the purposes and means of the processing of that personal data.

While using the Website, we will ask you to supply us with some data which can be personal or non-personal data and other information that we will expressly list out in this Privacy Policy. The essence of all the data we ask you to supply to us is to enable us not only to improve our services but to serve you better, thereby ensuring you are maximally satisfied.

Unless specifically defined, terms used throughout this Privacy Policy have the same definitions as those given in the Terms and Conditions of Use available on the Website (hereinafter – the “Agreement”).

For the purposes of this Privacy Policy:

- when we refer to “personal data” we mean any information that, individually or in combination, does or can identify a specific individual or by or from which a specific individual may be identified or contacted;
- when we refer to “processing” we mean the handling of your personal data by us, including collecting, protecting and storing your personal data;
- when we refer to “you”, “your” or “data subject” we mean an identifiable natural person is one who uses the Website and can be identified, directly or indirectly;
- when we refer to “we”. “our” or “us” we mean FATADS LTD, a legally registered company in the Republic of Cyprus under the registration number HE447431, with its official address at Spyrou Kyprianou, 78 Magnum Business Centre, 3rd floor 3076, Limassol, Cyprus;
- when we refer to our “Website” or our “Service” we mean <https://affroom.com/>.

### 1. Information we may collect and process

1.1. In relation to your use of our Website and Services, we may collect information directly from you when you provide information to us during the registration process.

1.2. Most commonly, we will use your data in the following circumstances:

	Type of data	Purpose	Legal basis for processing
1.	Profile data. Your name, email address, social media link.	Operating our Website, providing our services, communicating with you. Fulfillment of KYC/AML procedures.	Legitimate interests in the proper administration of our Website. Performing the Agreement we have with you.
		Marketing and promotional	Consent.

		communications.	
2.	Transaction data. The transaction data, your name, contact details, address, city, state / region, country, your card details and the transaction details.	The transaction data may be processed for the purpose of payments and keeping proper records of those transactions.	Performing the Agreement we have with you.
3.	Data about your use of our Website. IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views, website navigation paths, timing, frequency, pattern of your service use	To analyze the operation of our Website and services, and improve them.	Legitimate interests in monitoring and improving our Website and services.
4.	Any of your personal data identified in this Policy.	Exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure, the protection and assertion of our legal rights, your legal rights and the legal rights of others.	Our legitimate interests.

1.3. Our use of your personal data is limited to that which is reasonably required in order to fulfill our obligations under the Agreement, and provide access to the Website and the services to you and to make improvements to the Website and the services which benefit both us and you.

1.4. We do not use your personal data for any reasons not stated in this Privacy Policy and never use it in an excessive manner that is disproportionate to our aims of providing and improving our service or in a way that is contrary to your interests.

### 3. Sharing your data

3.1. We so much respect your privacy and we understand the salient and confidential nature of the information you provide to us; so we assure you that all information supplied to us will be held privileged. However, there are times we may disclose your information to third parties listed below:

3.1.1. Any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this Privacy Policy.

3.1.2. Our insurers and/or professional advisers insofar as reasonably necessary for the purposes of managing risks, obtaining professional advice, or the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative procedure.

3.1.3. Payment services providers that we have chosen to support us with financial transactions relating to our Website, only to the extent necessary for the purposes of processing your payments, or refunding such payments.

3.1.4. Partners, contractors and/or vendors who we engage from time to time to provide us with any services or facilities which we use for the purpose of administering our business and providing our Service to You.

3.1.5. Governmental and regulatory bodies, including law enforcement authorities, in connection with enquiries, proceedings or investigations by such parties or in order to enable Us to comply with its legal and regulatory requirements.

3.1.6. If we are involved in a merger, acquisition or asset sale, your personal data may be transferred to our assignee, acquiring company or transferee of the assets.

3.2. When we disclose your information to third parties, we require those third parties to have appropriate technical and organizational measures in place to protect your personal data. We will not share any of your personal data for any purpose other than the purposes described in this Privacy policy, nor will we sell your personal data to anyone.

#### **4. Retaining And Deleting Personal Data**

4.1. We will keep your personal data for as long as is necessary for the purpose for which we initially collected them. Once such period has ended, we will keep your personal data for the longest of the following periods: (a) any retention period set out in our retention policy which is in line with regulatory requirements relating to retention; or (b) the end of the period in which legal action or investigations might arise in respect of the services provided.

4.2. Personal data collected for purposes related to the performance of the Agreement shall be retained until such agreement has been fully performed, or as long as you continue to use our services, e.g. you have an active account on our Website.

4.3. Personal data may be retained for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

4.4. Once the retention period expires, personal data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

#### **5. International Transfers of Your Personal Data**

5.1. All the information you supplied to us is safe and secure. Your Personal data may be transferred to and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those from your jurisdiction.

5.2. We have put in place various measures to ensure your information is safe and confidential from third parties. We further assure you that on no account will your information be transferred to any unsafe jurisdiction or organization, or contrary to the terms set out in this privacy policy.

5.3 In the event that one or more recipients of your personal data are located outside the EEA, where data protection laws may be of a lower standard than in the EEA, we will impose the same data protection safeguards that we deploy inside the EEA to ensure that your personal data are always protected.

## **6. Third Party Tracking Technologies on our Website**

### **6.1. Google Analytics**

In order to optimize the Website and improve the user experience, we use Google Analytics, a web analytics service provided by Google, Inc. ("Google").

### **6.2. Google Ads**

We use Google Ads to measure the effectiveness of our online advertising campaigns. This tool helps us to understand whether users who click on our ads take specific actions on the Website.

### **6.3. Google Tag Manager**

We use Google Tag Manager to manage and deploy marketing and analytics tags on our Website without modifying the codebase.

## **7. Children's Privacy**

7.1. If you are less than 18 years of age, you are advised to stay away from the Website and the services. In the event of us realizing we've received information from a user under 18 years of age, without the parent's consent, such information will be deleted immediately.

## **8. Cookies**

8.1. We may use session and analytics cookies or similar technologies. Cookies are small text files that enable us to collect the information about web-browsing activities such as the pages visited by You and the time You spent on viewing the page. You may decline the cookies at his or her discretion in the personal settings of the web-browser.

## **9. The rights of data subjects**

9.1. We have set out the condition for which we collect and use the Personal data of data subjects, this condition or basis depends mainly on the specific data collected.

9.2. You have the following rights in terms of the personal data we hold about You:

1.	The right to be informed.	We are publishing this Privacy Policy to keep you informed as to what we do with your personal data. You can ask us for information regarding any data of yours that we keep at any time. This information concerns, among other things, the data categories we process, for what purposes we process them, the origin of the data if we did not acquire them directly from you and, if applicable, the recipients to whom we have sent your data.
2.	The right to access.	This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. You can obtain a copy of your data from us free of charge. If you are interested in other copies, we reserve the right to charge for the additional copies.

3.	The right to correction (rectification).	You can request that we correct your data. We will initiate appropriate measures to keep the data of yours that we continuously process correct, complete, and up to date, based on the latest information available to us.
4.	The right to erasure.	<p>You can request that we delete your data provided the legal requirements have been met. In accordance with Article 17 the GDPR, this can be the case if:</p> <ul style="list-style-type: none"> <li>• the data are no longer required for the purposes they were acquired or otherwise processed;</li> <li>• you revoke your consent, which is the basis of the data processing, and there is no other legal basis for the processing;</li> <li>• you object to the processing of your data and there are no legitimate reasons for the processing or you object to data processing for the purposes of direct advertising;</li> <li>• the data has been processed illegally.</li> </ul> <p>The process of erasing your personal data can take up to one month and, considering the complexity and number of requests, may be extended by a further two months.</p>
5.	The right to restrict processing.	<p>You can request that we restrict the processing of your data if</p> <ul style="list-style-type: none"> <li>• You dispute the correctness of the data – for the period of time we need to check the correctness of the data;</li> <li>• The processing is illegal but you do not wish to have your data deleted and request a restriction of use instead;</li> <li>• We no longer need your data, but you need them to assert, exercise or defend against legal claims;</li> <li>• You have filed an objection to the processing, though it has not yet been decided whether our legitimate grounds outweigh yours.</li> </ul>
6.	The right to data portability.	At your request, we will transfer your data– where technically possible – to another responsible entity. However, this right only applies if the data processing is based on your consent or is required to fulfill the Agreement. Instead of receiving a copy

		of your data, you can ask us to send the data directly to another responsible entity that you specify.
7.	The right to object.	You can object to the processing of your data at any time for reasons that arise from your special situation provided the data processing is based on your consent or our legitimate interest or that of a third party. In this case, we will no longer process your data. The latter does not apply if we are able to prove there are compelling, defensible reasons for the processing that outweigh your interests or we require your data to assert, exercise or defend against legal claims.
8.	The right to withdraw consent.	Withdraw the consent you gave us with regard to the processing of your personal data for certain purposes, such as to allow us to promote our products and services to you.
9.	The right to complain	You have a right to lodge a complaint with a data protection supervisory authority.

We endeavor to address all of your requests promptly.

## **10. Residents of California**

10.1. If you are a California resident, you can request a notice disclosing the categories of personal information about you that we have shared with third parties for their direct marketing purposes during the preceding calendar year. To request this notice, please submit your request to the email [contact@affroom.com](mailto:contact@affroom.com). Please allow 30 days for a response. For your protection, we may ask you to provide proof of identity before we can answer such a request.

## **11. Privacy Policies of other websites**

11.1. We has no responsibility or liability for the content and activities of any other individual, company or entity whose website or materials may be linked to the Website, and thus we cannot be held liable for the privacy of the information on their website or that you voluntarily share with their website. Please review their privacy policies for guidelines as to how they respectively store, use and protect the privacy of your information. We are also not responsible for the information and data that you provide to other users or third parties.

## **12. Changes in the Privacy Policy**

12.1. We may update, add to, change, or modify the Privacy Policy from time to time by publishing a new version on our Website and updating the "Last updated" date at the top of this Privacy Policy. Your continued use of the Website after any changes are posted constitutes your acceptance of the updated Privacy Policy. You acknowledge that the ongoing use of the Website is independent and adequate consideration in support of such modification.

### **13. Security and confidentiality of your data**

13.1. We appreciate and value the information you give to us so we take precautions to protect your information. When you submit your information via the Website or the Services your information is protected both online and offline. Whenever we collect personal data, these data are encrypted and transmitted to us in a secure way. While we use encryption to protect personal data online, we also protect your information offline. The computers/servers in which we store personally identifiable information are kept in a secure environment. But remember that no method of transmission over the internet, or method of electronic storage is 100% secure and reliable and we cannot guarantee its absolute security.

13.2. We use standard adequate security measures against loss, misuse or alteration of your information. However, we cannot guarantee the total invulnerability of the security system from illegal actions of the third parties and You shall not address any claim in relation to any damages caused by illegal actions of the third parties.

13.3. Please ensure to keep your account data away from third parties. It is your responsibility to protect your username and password from disclosure to others. We will not be responsible for any unauthorized or improper use of your information, as well as for any loss or damage arising from your failure to protect your account data. If you share your data with others, they may be able to obtain access to your Personal data at your own risk.

### **14. Assignment of Rights**

14.1. In the event of an assignment, sale, joint venture, or other transfer of some or all of our assets, you agree we can assign, sell, license or transfer any information that you have provided to us. Please note, however, that any purchasing party is prohibited from using the personal data or Other Information submitted to us under this Privacy Policy in a manner that is materially inconsistent with this Privacy Policy without your prior consent.

### **15. Controller's name and contact details**

15.1 The data controller in respect of the Website and our Services (as defined below) is:

FATADS LTD.  
Company number: HE 447431  
Spyrou Kyprianou,  
78 Magnum Business Center, 3rd floor 3076,  
Limassol, Cyprus

15.2. If you have any questions about our Privacy policy or wish to obtain more details in relation to the personal data we process about you or wish to exercise any of your rights, please contact us via email at the address: [contact@affroom.com](mailto:contact@affroom.com).