PRIVACY POLICY

The website www.zorachka.com ("Website") is operated by Zorachka Inc. and its subsidiaries Zorachka Ltd and Zorachka Soft LLC (together "Zorachka" or "we," "us").

At Zorachka your privacy comes first. For transparency, this privacy policy provides detailed information about personal data we collect on the Website and how we use it. To learn more about how we use cookies, please see our <u>Cookie Policy</u>.

1. PERSONAL DATA WE COLLECT FROM YOU AND HOW WE USE IT

We did our best to minimize personal data collected from our users.

On our Website we only collect information that is strictly necessary to provide you with the requested services and products. We process it to the extent necessary for the following purposes.

- 1. When you place an order or a pre-order, we collect and process your email address, full name, date of purchase or pre-order, billing and delivery address, and phone number in order to check that the payment has been made, to inform you when the product is available, to deliver your order, and to provide you with customer support.
- 2. When you pay for an order, your email address, full name, IP address, account number, card expiration date and card validation code are processed on behalf of Zorachka.
- 3. When you subscribe to our Website, we collect and process your email address to send you the latest Zorachka news.
- 4. When your order is delivered, we collect and process information about the date of delivery to ensure fulfillment of your order and provide you with customer support.
- 5. When you contact customer support by phone, email, or via the Website, we collect and use your contact details so we can follow up on your request later.
- 6. When you make a request to return our product, we collect and process your contact information (email address, full name, billing and delivery address and phone number), product details (product number, model and serial numbers), payment information, date of delivery and the return authorization number, as described in the Return Policy, to ensure that you are the owner of the Product.

We will not sell your personal data described in paragraphs 1-6 above to any third parties.

We may collect bits of information about your activities across the Website using cookies. To learn more about how we use cookies, please see our <u>Cookie Policy</u>.

2. YOUR PRIVACY RIGHTS

We are committed to providing you with vast privacy rights in respect to your personal data.

• Right to deletion. You can demand that we delete your personal data collected by us.

- **Right to opt out.** You can ask us to stop processing your personal data, either generally or for specific purposes. However, please keep in mind that we only collect and process personal data that is strictly necessary for us to perform our services and deliver our products. Hence, it is highly likely that we will not be able to perform our services after you withdraw your consent to our processing of your personal data.
- **Right to access.** You have the right to request information about what personal data we have about you, to access all your personal data and to receive a copy of it in a structured and portable form.
- **Right to be informed.** Before we collect any personal data, we shall inform you about the categories of personal data to be collected and processed, about the purpose of such collection and processing, about your rights, including the right to lodge a complaint with a supervisory authority, about the period of data retention, and include our contact details in the privacy policy.
- **Right to complain.** Subject to applicable laws, you may have the right to lodge a complaint with your local data protection authority about any of our activities that you deem are not compliant with the law.
- **Right to correct personal data.** If you believe that your personal data is inaccurate, you have the right to contact us and ask us to correct that data.

3. HOW TO EXERCISE YOUR RIGHTS

If you would like to exercise any of your aforementioned privacy rights, please contact us at **support@zorachka.com**. We will implement any applicable changes within a month of your communication with us. In some cases, this may take up to 3 months (for example, for full erasure of personal data stored in our backup systems). We will let you know if we need more time and explain the reasons for the delay.

4. RETENTION OF YOUR PERSONAL DATA

We will retain your personal data no longer than required to provide you the requested services and products, and only for as long as it serves the processing purposes identified in Section 1 of this Privacy Policy. You can ask us to delete your personal data at any time, in accordance with the Privacy Policy.

5. SECURITY OF YOUR PERSONAL DATA

We take all reasonable and appropriate measures to protect all personal data collected from loss, theft, misuse and unauthorized access, disclosure, alteration, and destruction. This includes organizational and technical measures based on best practice.

6. TRANSFER OF YOUR PERSONAL DATA

We share certain personal information with third parties who help us to provide our services. Such third parties may include: (1) payment service providers, (2) vendors who help us with the performance of our services and the delivery of our products, and (3) Zorachka Group companies, which include Zorachka Ltd (Cyprus), Zorachka Inc. (USA), and Zorachka Soft LLC (Belarus).

We use all appropriate safeguards to ensure that any international transfers of your personal data within Zorachka do not violate your rights.

We do not transfer your personal data to any third party not mentioned in Section 6 without your consent.

7. CHILDREN'S PRIVACY

We are committed to protecting the privacy of children. Our services and products are not intended for children and we do not intentionally collect information about children under 13 years of age (16 for European Union residents). The Website does not collect personal data from any person Zorachka actually knows is under the age of 13 (16 for European Union residents). If you think that this may be the case, please contact us at **support@zorachka.com** and we will take the required steps, including deletion of such information.

8. CHANGES TO THE PRIVACY POLICY

We reserve the right to and may change this Privacy Policy from time to time. If we make any material changes, we will notify you by email. In some cases, you will be asked to accept changes to the Privacy Policy explicitly.

9. CONTACT

If you have any questions or concerns about your privacy, you may contact us at support@zorachka.com or call Zorachka Support team at +1 (424) 209-2249.

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