

PRIVACY POLICY AND PERSONAL DATA PROTECTION (Effective from December 10, 2024)

Management of the platform located at: <https://overpay.org/> (hereinafter referred to as the “Platform” / “Website”) and the provision of services listed on the Platform is carried out on behalf of Overpay.org.

This Privacy Policy and Personal Data Protection (hereinafter referred to as the "Privacy Policy") governs all information the Platform Owner and/or Website Administration receives about the Visitor / Customer during the use of the Website or in the process of receiving services, programs, and products provided as part of these services.

The Privacy Policy establishes the procedure for processing personal data by the Owner, types of personal data collected, the purpose of using such data, interaction of the Owner with third parties, security measures for data protection, access conditions, as well as contact information for Customers to request access, make changes, block or delete personal data, or address any questions Visitors / Customers may have regarding data protection practices.

1. KEY DEFINITIONS

- 1.1. Website / Platform – the website owned by the Owner located at <https://overpay.org/> and managed by the Website Administration.
- 1.2. Website Administration – authorized individuals managing the Website, organizing and processing personal data, determining the purposes of processing, the types of personal data to be processed, and the actions performed with such data.
- 1.3. User Agreement – a document published on the Website governing relationships between Customers, Visitors, and the Owner in the course of providing services. The User Agreement constitutes a public offer and adhesion contract.
- 1.4. Visitor – any individual who accesses and uses the Website via the Internet.
- 1.5. Customer – a Visitor who has accepted the User Agreement and placed an order on the Website, thus becoming the recipient (consumer) of services under the User Agreement.
- 1.6. Personal Data – any information directly or indirectly related to a specific individual (data subject).
- 1.7. Services – services provided by the Website Owner, as described in the User Agreement and listed on the Website.
- 1.8. Processing of Personal Data – any operation or set of operations performed on personal data, with or without automated means, including collection, recording, systematization, storage, updating, retrieval, use, transfer, blocking, deletion, or destruction.
- 1.9. Confidentiality of Personal Data – a mandatory requirement for the Website Administration or other individuals with access to personal data not to disclose such data without the consent of the data subject or another lawful basis.
- 1.10. This Privacy Policy may include terms not defined in this section. In such cases, terminology shall be interpreted based on the context of this Privacy Policy. In the absence of a clear interpretation, terms should be understood per materials on the Website, followed by their definition on the Internet.

2. GENERAL PROVISIONS

- 2.1. Use of the Platform by Visitors / Customers signifies automatic and full acceptance of this Privacy Policy and the terms of personal data processing.
- 2.2. If a Visitor disagrees with the terms of the Privacy Policy, they must cease using the Website and leave immediately.

- 2.3. This Privacy Policy applies to the Website, Services, or Mobile Application.
- 2.4. The Website does not control or bear responsibility for third-party websites accessed through links available on the Website.
- 2.5. The Website Administration does not verify the accuracy of personal data provided by Visitors / Customers.
- 2.6. The Website Administration acts as the controller of personal data of authorized Service Customers. The controller determines the purposes and means of personal data collection.

3. SUBJECT OF THE PRIVACY POLICY

- 3.1. This Privacy Policy establishes the Website Administration's obligations for non-disclosure and confidentiality of personal data provided by the Customer during registration or use of the Platform.
- 3.2. Personal data allowed for processing includes: • Full name of the Customer; • Contact phone number; • Email address; • Other confidential personal or contact details provided by the Customer.
- 3.3. The Website Administration reserves the right to collect additional data automatically during the Customer's use of the Platform, including but not limited to: • Device IP address; • Browser cookie data; • Geolocation data (country, region, GPS location); • Device information (computer, phone, tablet); • Browser details (name, version); • Access times; • Page addresses viewed on the Website; • Previous webpage addresses accessed before the Website.
- 3.4. Disabling cookies may restrict access to certain parts of the Website.
- 3.5. The data collected under clauses 3.2 and 3.3 is used for troubleshooting, load monitoring, proper service provision, analytics, statistics, and marketing purposes.
- 3.6. Other personal or confidential data not explicitly outlined in this Policy will be securely stored and not disclosed unless specified in clauses 7.2 and 7.3 of this Privacy Policy.
- 3.7. Information collection is performed when Visitors / Customers: • Use the Website; • Purchase Services; • Create or request account creation.
- 3.8. The Website Administration does not collect sensitive information such as racial or ethnic origins, political or religious beliefs, union memberships, criminal records, health, sexual orientation, biometric or genetic data.
- 3.9. Visitors / Customers may transmit personal data via: • Email correspondence; • Website use; • Service request forms.

4. RESTRICTIONS

- 4.1. By registering or placing an order, Visitors / Customers confirm they are of legal age to enter agreements independently.
- 4.2. If consent for data processing is required, Visitors / Customers may provide it themselves.
- 4.3. If unsure about their eligibility to consent to data processing, Visitors / Customers should contact an authorized data protection body.
- 4.4. The Website Administration may request additional documents or procedures to ensure the Customer's eligibility to consent independently.

The rest of the Privacy Policy follows similar guidelines and will be drafted accordingly.