

## PRIVACY POLICY

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, the Controller declares that it has implemented all measures to protect the User data, as expressed in this Privacy Policy.

### 1. DEFINITIONS

1.1. **Controller** – the controller of personal data, i.e. Antym Holdings Limited, Dositheou 5, Parabuilding Block A, 1st floor, Flat/Office 102A, 1071 Nicosia, Cyprus, registration number HE 321240.

1.2. **Personal Data** – any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

1.4. **GDPR** – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC;

1.5. **User** – a natural person whose data was obtained by the Controller through the Website and a natural person whose personal data was obtained by the Controller in a manner other than through the use of the Website;

1.6. Other definitions, not listed above, shall have the customary meaning.

### 2. CONTROLLER

2.1. Antym Holdings Limited, Dositheou 5, Parabuilding Block A, 1st floor, Flat/Office 102A, 1071 Nicosia, Cyprus, registration number HE 321240, is the Controller of Personal Data collected via the Website.  
Email: sale@fordeals24.com

2.2. The Controller shall make all efforts to protect the interests of data subjects, and in particular shall ensure that the collected data is:

- 1) processed in line with the law in force;
- 2) collected for specified, legitimate purposes and not subject to further processing incompatible with those purposes;
- 3) factually correct and relevant for the purposes for which it is processed;
- 4) stored in a form that makes it possible to identify data subjects for whom it is no longer necessary to achieve the purpose of the processing.

### 3. PURPOSE OF DATA COLLECTION

3.1.	In connection with the User's use of the Website, the Controller shall collect data, to the extent necessary to provide services via the Website, and information about the User's activity on the Website
3.2.	The User's Personal Data shall be subject to special protection and shall be used only to the extent to which the User has given their consent.
3.3.	User data shall be processed by the Controller for the following purposes 1) to process the order placed; 2) to contact the User; 3) to provide payment services support; 4) to handle complaints; 5) to assert and defend against claims; 6) to perform statutory obligations of the Controller, in particular tax or accounting settlements; 7) for data transmission over the network and the proper functioning of the basic functions of the Website; 8) to analyse how Users use the Website in order to improve performance and enhance the User experience; 9) to adapt advertisements to the User's needs and preferences and make content published on the Website available through external social networks and other external services, including for advertising purposes; 10) for analytical and statistical purposes; 11) for direct marketing; 12) to receive commercial information (if the User gives a separate consent).
<b>4.</b>	<b>SCOPE OF DATA PROCESSING</b>
4.1.	The Controller may process the following User data:: a) name and surname; b) e-mail address; c) mobile phone number; d) delivery address (street, house number, flat number, postcode, city, country); e) place of residence/business address/registered office address (if different from delivery address); f) tax number (for Users who are not consumers) g) business name (for Users who are not consumers); h) device IP address;; i) browser type; j) Website usage and diagnostic information; k) search history; l) summary of session; j) location information and other data provided automatically through the web browser.
<b>5.</b>	<b>PODSTAWA PRAWNA PRZETWARZANIA DANYCH</b>
5.1.	The following circumstances constitute the legal basis for the processing of User data: a) taking necessary actions before entering into the agreement with the User and during its execution (Article 6(1)(b) of GDPR);

	<p>b) complying with legal obligations of the Controller, including accounting and tax regulations (Article 6(1)(c) of GDPR);</p> <p>c) legitimate interests: asserting and defending against claims, improvement of the Controller's products and services (Article 6(1)(f) of GDPR);</p> <p>d) the User's consent for the Controller to send commercial information in electronic form or establish phone contact in order to present the Controller's offers (Article 6(1)(a) of GDPR).</p>
5.2.	The User may revoke consent at any time by using the e-mail address provided on the Website. The withdrawal of consent shall not affect the lawfulness of the processing based on consent before its withdrawal.
5.3.	The User shall also have the right to lodge a complaint with the personal data protection supervisory authority.
5.4.	Providing personal data is voluntary, but necessary to enter into an agreement between the User and the Controller or to create an account on the Website.
<b>6.</b>	<b>AUTOMATED DECISION MAKING</b>
6.1.	The Controller may use profiling on the Website for direct marketing purposes, but the decisions made by the Controller on the basis of profiling shall not affect entering into or refusal of the Agreement or the ability to use the services of the Website.
6.2.	The data subject shall have the right not to be subject to a decision when it is based solely on automated processing, including profiling, and produces legal effects concerning the data subject or similarly significantly affects the data subject.
<b>7.</b>	<b>DATA RECIPIENTS</b>
7.1.	<p>When it is necessary for the purposes for which the Controller processes User data, User data may be transferred:</p> <p>a) to entities authorised to receive User data under the law (e.g. law enforcement agencies, supervisory authorities, etc.);</p> <p>b) to entities processing Personal Data on behalf of the Controller, i.e. companies providing the Controller with certain services involving the processing of personal data, e.g. entities operating IT systems or providing ICT tools, entities providing payment services, entities providing accounting, marketing, or recruitment services, and entities providing courier or postal services;</p> <p>c) to external entities acting as parties to the transaction entered into by the User through the Controller;</p> <p>d) to other entities belonging to the Group to which the Controller belongs, i.e. entities having capital or personal relations with the Controller;</p> <p>e) to a new owner to ensure continuation of the Controller's services in the event that the Controller sells its business and transfers all assets to a new owner, Personal Data of Users may be transferred to the new owner to ensure continuation of the Controller's service.</p>
<b>8.</b>	<b>DATA RETENTION PERIOD</b>
8.1.	User data shall be stored no longer than necessary to fulfill the purposes for which it was collected, i.e. for:

	<p>a) the period necessary for the proper performance of the agreements entered into with the User;</p> <p>b) the duration of the Website account;</p> <p>c) the period necessary to provide the User with all necessary information upon request;</p> <p>d) the period necessary to assert or defend against claims;</p> <p>e) the period during which the Controller is required by law to retain a particular type of documentation;</p> <p>f) until the User withdraws its consent or objects to the processing.</p> <p>The User data shall be deleted by the Controller upon the expiry of all the periods referred to above.</p>
<b>9.</b>	<b>DATA SECURITY</b>
9.1.	The Controller shall store data on the Controller's servers that ensure full data security.
9.2.	The Controller shall conduct a risk analysis on an ongoing basis in order to ensure that Personal Data is processed in a secure manner ensuring that only authorised persons have access to the data and only to the extent necessary for the performance of their tasks. The Controller shall ensure that all operations on Personal Data are recorded and performed only by authorised employees and associates.
<b>10.</b>	<b>TRANSFER OF DATA OUTSIDE THE EEA</b>
10.1.	The User Personal Data may be transferred outside the European Economic Area in the event that an entity from outside the European Economic Area is a party to a transaction made by the User through the Controller and the transfer of the data is necessary to perform the agreement.
<b>11.</b>	<b>FINAL PROVISIONS</b>
11.1.	If the Website contains links to other websites that are not administered by the Controller, the Controller shall not be liable for the content of those websites and the level of privacy protection provided by the controllers of those websites.
11.2.	The Controller reserves the right to make amendments or supplements to this Privacy Policy. Amendments to this Privacy Policy shall be effective upon implementation.
11.3.	The Controller uses so-called cookies. The detailed rules on the use of cookies can be found on the Website under the Cookies Policy tab.