### **Privacy Policy**

#### Data controller is:

Yuri Karachenko

Homonenko Str. 10, Surface 4, Office 1

61037 Kharkiv

Ukraine

privacy@gryb.io

Thank you for visiting our websites (gryb.io, de.gryb.io, ru.gryb.io). Protection of your privacy is very important to us. Below you will find extensive information about how we handle your data.

## 1. Access data and hosting

You may visit our website without revealing any personal information. With every visit on the website, the web server stores automatically only a so-called server log file which contains e.g. the name of the requested file, your IP address, the date and time of the request, the volume of data transferred and the requesting provider (access data), and documents the request.

These access data are analyzed exclusively for the purpose of ensuring the smooth operation of the website and improving our offer. This serves according to Art. 6 (1) 1 lit. f) GDPR the protection of our legitimate interests in the proper presentation of our offer that are overriding in the process of balancing of interests. All access data are deleted no later than seven days after the end of your visit on our website.

#### Third-party hosting services

Data are also processed by a third-party provider that we have engaged to render hosting and website presentation services on our behalf. This provider processes on its servers all data that are collected in the manner specified below when you visit our website or fill in forms made available for this purpose at our contact page. Data are processed on other servers only within the scope described herein.

This service provider is based in a non-EU member state, which, according to the decision adopted by the European Commission, ensures an adequate level of data protection.

## 2. Data collection and use for processing the contract, making contact

We collect personal data that you disclose to us whenever you place an order or contact us (e.g. via contact form or by email). Mandatory fields are marked as such because we absolutely need those data to perform the contract or process your

contact request, and you would otherwise not be able to complete your order or send the contact request. It is evident in each input form what data are collected.

We use the data that you disclose to us to perform the contract and process your enquiries according to Art. 6 (1) 1 lit. b) GDPR. Upon contract completion, any further processing of your data will be restricted, and your data will be deleted upon expiry of any retention period applicable under relevant statutory regulations, unless you expressly consent to the further use of your data or we reserve the right to further use your data in the scope and manner permitted by law, of which we inform you in this notice.

## 3. Transfer of data

Depending on the payment service provider you have selected during the payment process, we disclose the payment details collected for contract processing purposes to the bank commissioned to handle the payment and, as the case may be, to the payment service provider commissioned by us or to the selected payment service. Some of those data are collected by the selected payment service providers themselves if you open an account with them. In such a case, during the money transfer, you must register with your payment service provider using your access data. In this respect, the privacy notice of the relevant payment service provider applies.

We also use an external merchandise management system for order and contract processing. The data transfer or processing that takes place in this respect is based on contract processing.

## 4. Email newsletter

## Email advertising if you subscribe to the newsletter

If you subscribe to our newsletter, we will regularly send you our email newsletter based on your consent according to Art. 6 (1) 1 lit. a) GDPR, using the data required or disclosed by you separately for this purpose.

You may unsubscribe from the newsletter service at any time. For this purpose you can either send a message to the contact option specified below or use the opt-out link in the newsletter. Upon un-subscription, we will delete your email address unless you have expressly consented to the further use of your data or we reserve the right to further use your personal data in the scope and manner permitted by the law, of which we inform you in this notice.

# Email advertising if you do not subscribe to the newsletter and your right to opt out

If we receive your email address in connection with the sale of a product or service and you have not opted out, we reserve the right to regularly email you offers for products from our product range that are similar to those you have already purchased. This serves the protection of our legitimate interests in promoting and advertising our products to customers that are overriding in the process of balancing of interests.

You can opt out of this use of your email address at any time by sending a message to the contact option specified below or by using the opt-out link in the advertising email, without incurring any costs beyond the cost of transfer calculated at the base rates.

The newsletter is sent to you by our service provider who processes data on our behalf and to whom we disclose your email address.

This service provider is based in the USA and is certified to the EU-US Privacy Shield. The current certificate can be looked up <u>here</u> (<u>https://www.privacyshield.gov/list</u>). Based on this agreement between the USA and the European Commission, the latter has recognized entities certified to the Privacy Shield as those ensuring an adequate level of data protection.

#### 5. Cookies and web-analysis

In order to make visiting our website attractive and to enable the use of certain functions, we use so-called cookies on various pages.

Cookies are small text files that are automatically stored on your end device. Some of the cookies we use are deleted after the end of the browser session, i.e. after closing your browser (so-called session cookies). Other cookies remain on your end device and enable us to recognize your browser during your next visit (persistent cookies).

This serves the protection of our legitimate interests in the optimized presentation of our offer according to Art. 6 (1) 1 lit f GDPR that are overriding in the process of balancing of interests.

Cookies are also used for market research and for suitable product advertisements. Further information on this can be found in the notes for the respective tool below.

You can find the storage period in the overview function in the cookie settings of your web browser. You can set your browser so that you are informed about the setting of cookies and decide individually whether to accept them or whether to exclude the acceptance of cookies in certain cases or in general.

If cookies are not accepted, however, the functionality of our website may be restricted. Below you will find information on the cookies we use and the settings that can be made in your browser.

Below we present information on cookies we use and how you can customise your browser in that respect.

#### **Necessary cookies**

These cookies are necessary to enable you to use our website. This includes e.g. cookies that enable you to log into the customer area etc.

#### Analytical / performance cookies

These cookies enable collecting anonymised data about user behaviour on our website. We analyse them e.g. to improve the functionality of our website and recommend you products that will be interesting to you.

#### Functionality cookies

These cookies are used for certain features of our website, e.g. to improve the website's navigation, or deliver to you customised and relevant information (e.g. ads that match your interests).

#### **Targeting cookies**

These cookies record information about your visit to the website, previously viewed pages and links you clicked. We use this information to tailor our website and displayed ads to your interests.

How can I change cookie settings in my browser?

Every browser has a different policy for managing the cookie settings. The browser's policy is described in the Help menu of every browser and explains how you can change your cookie settings. To find out how to change the settings in your browser, see the links below:

<u>Internet Explorer™</u> (<u>https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-del</u> <u>ete-manage-cookies%C2%A0)</u>

<u>Safari™</u> (https://support.apple.com/kb/PH17191?viewlocale=en\_US&locale=de\_DE)

<u>Chrome™</u> (https://support.apple.com/kb/PH17191?viewlocale=en\_US&locale=de\_DE)

#### Firefox™

(https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-pref erences%C2%A0)

## <u>Opera™ (https://help.opera.com/en/latest/web-preferences/#cookies)</u>

As far as you have given your consent according to Art. 6 (1) 1 lit. a) GDPR, this website also uses the so-called DoubleClick cookie in the context of Google Analytics (see below) for marketing purposes. The DoubleClick cookie enables the recognition of your browser as you visit other websites. The information generated automatically by the cookie about your visit to this website will be transmitted to and stored on a Google server in the United States. By means of IP anonymization

enabled on this website, the IP address will be shortened before being transmitted within the area of member states of the European Union or other parties to the Agreement on the European Economic Area. Only in exceptional cases, the full IP address will be sent to a Google server in the USA and shortened there. Google will not join the anonymized IP address, transmitted from your browser through Google Analytics, with any other data held by Google.

Google will use this information to compile reports about your website activities and to provide other services related to the use of the website. In addition, Google may transfer this information to third parties from time to time if this is required by law or if third parties process such data on behalf of Google. After the purpose of use has ceased to exist and the use of Google DoubleClick has ended from our side, the data collected in this context will be deleted.

Google Double Click is an offer from Google Ireland Limited, a company incorporated and operated under Irish law with its registered office at Gordon House, Barrow Street, Dublin 4, Ireland (www.google.co.uk).

Where information is transmitted to and stored by Google on servers located in the United States, the U.S. company Google LLC is certified under the EU-US Privacy Shield. You will see the up-to-date certificate <u>here</u> (<u>https://www.privacyshield.gov/list</u>). Based on this agreement between the USA and the European Commission, the latter has recognized entities certified to the Privacy Shield as those ensuring an adequate level of data protection.

You may revoke your consent at any time with future effect, by clicking <u>this link</u> (<u>https://adssettings.google.com/authenticated?hl=en</u>). In addition, you can obtain information about the setting of cookies from the <u>Digital Advertising Alliance</u> (<u>http://www.aboutads.info/</u>) and accordingly adapt the settings of your browser. Finally, you can configure your browser for it to inform you about the setting of cookies and decide on a case-by-case basis whether to accept or reject the cookies on a given website or generally. Please note that disabling cookies may limit your access to some features of our website.

#### Using of Google (Universal) Analytics for web analytics

Insofar as you have given your consent according to Art. 6 (1) 1 lit. a) GDPR, this website uses Google (Universal) Analytics, a web analytics service provided by **Google (https://www.google.co.uk/)** for the purpose of website analytics. Google Analytics is an offer from Google Ireland Limited, a company incorporated and operated under Irish law with its registered office at Gordon House, Barrow Street, Dublin 4, Ireland (www.google.co.uk). Google (Universal) Analytics uses methods, like e.g. cookies, that enable an analysis of your use of the website. The information collected automatically by cookies about your use of this website are as a rule transmitted to and stored on a Google server in the United States. At the same time, as IP anonymization is enabled on this website, the IP address will be shortened before being transmitted within the area of member states of the European Union or other parties to the Agreement on the European Economic Area. Only in exceptional cases, the full IP address will be sent to a Google server in the USA and shortened

there. Generally, Google does not associate the anonymized IP address, transmitted from your browser through Google Analytics, with any other data held by Google.

Where information is transmitted to and stored by Google on servers located in the United States, the U.S. company Google LLC is certified under the EU-US Privacy Shield. You will see the up-to-date certificate <u>here</u>

(https://www.privacyshield.gov/list). Based on this agreement between the USA and the European Commission, the latter has recognized entities certified to the Privacy Shield as those ensuring an adequate level of data protection.

You may revoke your consent at any time with future effect by downloading and installing the browser plug that is available <u>at this link</u> (<u>https://tools.google.com/dlpage/gaoptout?hl=en</u>)</u>. This prevents the collection of data generated by the cookie and related to your use of the website (including your IP address) to Google and the processing of this data by Google.

Alternatively to the browser plugin, to prevent Google Analytics from recording your data on this website in the future. In this process, an opt-out cookie will be stored on your end-user device. If you clear your cookies, you will be asked to provide your consent again.

## 6. Online Marketing

#### **Google Ads remarketing**

We use Google Ads to advertise our website in Google search results and on third-party websites. As far as you have given your consent according to Art. 6 (1) 1 lit. a) GDPR for every visit of the website the so-called remarketing cookie of Google is set by Google, which allows the automatic displaying of interest-based advertising using a pseudonymous cookie ID and information about your website visits. After the purpose of use has ceased to exist and the use of Ads Remarketing has ended from our side, the data collected in this context will be deleted.

Any data processing that goes beyond that scope takes place only if you have allowed Google to associate your web and app browsing history with your Google account and to use information from your Google account to personalize ads that you see across the web. If, in such a case, you visit our website while being signed in to Google, Google will use your data together with Google Analytics data to build and define audience lists for cross-device remarketing. For this purpose, Google will temporarily join your data with Google Analytics data to build audiences.

Google Ads is an offer from Google Ireland Limited, a company incorporated and operated under Irish law with its registered office at Gordon House, Barrow Street, Dublin 4, Ireland (www.google.co.uk). Where information is transmitted to and stored by Google on servers located in the United States, the U.S. company Google LLC is certified under the EU-US Privacy Shield. <u>Here</u>

(<u>https://www.privacyshield.gov/list</u>) you can see the up-to-date certificate. Based on this agreement between the USA and the European Commission, the latter has

recognized entities certified to the Privacy Shield as those ensuring an adequate level of data protection.

You can revoke your consent at any time with future effect by clicking the remarketing cookie via <u>this link</u>

(https://adssettings.google.com/authenticated?hl=en). In addition, you can obtain information about the setting of cookies from the <u>Digital Advertising Alliance</u> (https://www.aboutads.info/) and accordingly adapt the settings of your browser.

## Google Maps

This website uses Google Maps for the visual representation of geographical information. Google Maps is an offer from Google Ireland Limited, a company incorporated and operated under Irish law with its registered office at Gordon House, Barrow Street, Dublin 4, Ireland (<u>www.google.co.uk</u>). This serves to safeguard our legitimate interests in an optimised presentation of our range of services and easy access to our locations in accordance with Art. 6 (1) 1 lit. f) GDPR that are overriding in the process of balancing interests

When using Google Maps, Google transmits or processes data about the use of the Maps functions by website visitors, which may include in particular the IP address and location data. We have no influence on this data processing.

Where information is transmitted to and stored by Google on servers located in the United States, the U.S. company Google LLC is certified under the EU-US Privacy Shield. A current certificate can be viewed <u>here</u>

(https://www.privacyshield.gov/participant?id=a2zt00000001L5AAl&status=Ac tive). As a result of this agreement between the US and the European Commission, the latter has established an adequate level of data protection for companies certified under the Privacy Shield.

To deactivate the Google Maps service and thus prevent data transmission to Google, you must deactivate the Java Script function in your browser. In this case Google Maps cannot be used or can only be used to a limited extent.

Further information about data processing by Google can be found in <u>Google's</u> privacy policy (https://policies.google.com/privacy?gl=uk&hl=en-GB). The <u>Terms of Use for Google Maps</u> (https://wwww.google.com/belp/terms\_maps\_html) contain detailed

(https://www.google.co.uk/intl/en\_en/help/terms\_maps.html) contain detailed information about the map service.

Data processing is carried out based on an agreement between jointly responsible parties pursuant to Art. 26 GDPR, which you can view <u>here</u> (<u>https://privacy.google.com/intl/de/businesses/mapscontrollerterms)</u>.

## Google reCAPTCHA

To protect against misuse of our web forms and spam, we use the Google reCAPTCHA service. Google reCAPTCHA is an offer from Google Ireland Limited, a company incorporated and operated under Irish law with its registered office at

Gordon House, Barrow Street, Dublin 4, Ireland (www.google.co.uk). By checking a manual entry, this service prevents automated software (so-called bots) from carrying out abusive activities on the website. In accordance with art. 6 (1) 1 lit. f) GDPR, this serves to protect our legitimate interests in the protection of our website from misuse as well as in a trouble-free presentation of our online presence that are overriding in the balancing of interests.

Google reCAPTCHA uses a code integrated into the website, a so-called JavaScript, as part of the verification methods that enable an analysis of your use of the website, such as cookies. The automatically collected information about your use of this website including your IP address is usually transmitted to a Google server in the USA and stored there. In addition, other cookies stored by Google services in your browser are evaluated by Google reCAPTCHA.

No personal data is read out or saved from the input fields of the respective form.

Where information is transmitted to and stored by Google on servers located in the United States, the U.S. company Google LLC is certified under the EU-US Privacy Shield. A current certificate can be viewed <u>here</u>

(https://www.privacyshield.gov/participant?id=a2zt00000001L5AAl&status=Ac tive). As a result of this agreement between the US and the European Commission, the latter has established an adequate level of data protection for companies certified under the Privacy Shield.

You can prevent Google from collecting the data generated by the JavaScript or the cookie and relating to your use of the website (including your IP address) and from processing this data by preventing the execution of JavaScripten or the setting of cookies in your browser settings. Please note that this may limit the functionality of our website for your use. Further information about data processing by Google can be found in <u>Google's privacy policy</u>

(https://policies.google.com/privacy?gl=uk&hl=en-GB).

## **Google Fonts**

This website contains the script code "Google Fonts". Google Fonts is an offer from Google Ireland Limited, a company incorporated and operated under Irish law with its registered office at Gordon House, Barrow Street, Dublin 4, Ireland (www.google.co.uk). This serves to protect our legitimate interests in a uniform presentation of the contents on our website in accordance with Art. 6 (1) 1 lit. f) GDPR.

This will establish a connection between the browser you are using and Google's servers. This gives Google knowledge that our website has been accessed via your IP address.

Where information is transmitted to and stored by Google on servers located in the United States, the U.S. company Google LLC is certified under the EU-US Privacy Shield. A current certificate can be viewed <u>here</u>

(https://www.privacyshield.gov/participant?id=a2zt00000001L5AAl&status=Ac

<u>tive</u>). As a result of this agreement between the US and the European Commission, the latter has established an adequate level of data protection for companies certified under the Privacy Shield.

Further information about data processing by Google can be found in <u>Google's</u> <u>privacy policy (https://policies.google.com/privacy?gl=uk&hl=en-GB)</u>.

### 7. Social Media

## Using of social plugins of Facebook, Instagram, Xing, using the Shariff solution.

Our website uses social network buttons.

This serves the protection of our legitimate interests in the optimal marketing of our website according to Art. 6 (1) 1 lit. f) GDPR that are overriding in the process of balancing of interests.

To increase the level of protection of your data during your visit to our website, those buttons are not wholly embedded in the website as plugins, but are integrated on the website using HTML links. This ensures that when you call a page of our website, which contains such buttons, no link to the servers of a social network provider is established yet.

If you click on a social network button, a new window will open in your browser which will call the page of the relevant service provider where you can use e.g. the 'Like' or 'Share' button (where applicable, after entering your login data).

To find out more about the purpose and scope of collection, further processing and use of the data by the providers on their websites, and to learn about the available contact options and your rights in this respect and how you can customise your browser to better protect your privacy, please see the data privacy policies of the providers:

#### https://en-gb.facebook.com/policy.php

#### https://help.instagram.com/155833707900388

#### https://privacy.xing.com/en

#### Our online presence on Facebook, Instagram, LinkedIn

Our presence on social networks and platforms serves a better, active communication with our customers and interested parties. We inform there about our products and current special offers.

When you visit our websiteson social media, your data may be automatically collected and stored for market research and advertising purposes. So-called usage profiles are created from these data using pseudonyms. These can be used, for example, to place advertisements inside and outside the platforms that presumably

correspond to your interests. For this purpose, cookies are usually used on your terminal. The visitor behaviour and the interests of the users are stored in these cookies. This serves in accordance with Art. 6 (1) 1 lit. f) GDPR to protect our legitimate interest in an optimised presentation of our offer and effective communication with customers and interested parties that are overriding in the balancing of interests. If you are asked by the respective social media platform operators for a consent into the data processing, e.g. with the help of a checkbox, the legal basis of data processing is Art. 6 (1) 1 lit. a) GDPR.

If the aforementioned social media platforms are headquartered in the USA, the following applies: The European Commission has adopted a decision on appropriateness for the USA. This goes back to the EU-US Privacy Shield. A current certificate for the respective company can be viewed <u>here</u> (https://www.privacyshield.gov/list).

For detailed information on the processing and use of the data by the providers on their pages as well as a contact option and your rights and setting options for the protection of your privacy, in particular opt-out options, please refer to the providers' data protection information linked below. If you still need help, you can contact us.

Facebook: https://www.facebook.com/about/privacy/

Instagram: https://help.instagram.com/519522125107875

LinkedIn: https://www.linkedin.com/legal/privacy-policy

Possibility to object (opt-out):

Facebook: https://www.facebook.com/settings?tab=ads

Instagram: https://help.instagram.com/519522125107875

LinkedIn: https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out

#### 8. Contact possibilites and your rights

Being the data subject, you have the following rights according to:

• art. 15 GDPR, the right to obtain information about your personal data which we process, within the scope described therein;

•art. 16 GDPR, the right to immediately demand rectification of incorrect or completion of your personal data stored by us;

• art. 17 GDPR, the right to request erasure of your personal data stored with us, unless further processing is required

- to exercise the right of freedom of expression and information;

- for compliance with a legal obligation;

- for reasons of public interest or
- for establishing, exercising or defending legal claims;

• art. 18 GDPR, the right to request restriction of processing of your personal data, insofar as

- the accuracy of the data is contested by you;
- the processing is unlawful, but you refuse their erasure;

- we no longer need the data, but you need it to establish, exercise or defend legal claims, or

- you have lodged an objection to the processing in accordance with art. 21 GDPR;

• art. 20 GDPR, the right to receive your personal data that you have provided to us in a structured, commonly used and machine-readable format or to request its transmission to another controller;

• art. 77 GDPR, the right to complain to a supervisory authority . As a rule, you can contact the supervisory authority at your habitual place of residence or workplace or at our company headquarters.

If you have any questions about how we collect, process or use your personal data, want to enquire about, correct, restrict or delete your data, or withdraw any consents you have given, or opt-out of any particular data use, please contact:

Yuri Karachenko

Homonenko Str. 10, Surface 4, Office 1

61037 Kharkiv

#### Data protection Officer:

Homonenko Str. 10, Surface 4, Office 1

61037 Kharkiv

privacy@gryb.io

## **Right to object**

If we process personal data as described above to protect our legitimate interests that are overriding in the process of balancing of interests, you may object to such data processing with future effect. If your data are processed for direct marketing purposes, you may exercise this right at any time as described above. If your data are processed for other purposes, you have the right to object only on grounds relating to your particular situation.

After you have exercised your right to object, we will no longer process your personal data for such purposes unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

This does not apply to the processing of personal data for direct marketing purposes. In such a case we will no longer process your personal data for such purposes.