

PRIVACY POLICY

Last updated 01.01.2024

In accordance with the requirements established in the Customer Data Protection Act of the Republic of Estonia, the parties – the User/Client and the Commercial Undertaking – must follow the legal acts related to the protection of customer data, including, but not limited to, the General Data Protection Regulation, GDPR.

The Company (hereinafter referred to as the Private Limited Company, or the Company) shall process personal data only to the extent and in the manner that are required for the purpose of performance of the obligations of the Private Limited Company CV Pro OÜ to the Client and Service provision. The main goal of the processing of the Client data is to perform the contracts entered into with the Client and manage them. The goal of data processing may be, for example, the implementation of required measures before the conclusion of the contract, also the conclusion of the contract with the Client, and the performance and termination of the contract.

The Client must: ensure the existence of all required notices and permissions for the purpose of legal transfer of personal data to the Private Limited Company, also ensure that each subject of personal data should now and in the future be notified about the processing of personal data related to the present Agreement.

Please read our Privacy Policy and confirm your consent to the processing of your data. If you have some questions, please send us an e-mail at office@cvpro.ee. Thank you!

DEFINITIONS:

A Client is each natural or legal entity that is using or has used or has expressed a wish to use the services of the Company, or a party that is related to them in some other way. The Rules shall also apply to such customer relations that were valid before the Rules have come into effect.

The Private Limited Company is the Company CV Pro OÜ (registry code: 16357218), registered in Estonia (hereinafter referred to as the Private Limited Company/Company).

Rules for Processing Customer Data are the principles, on the basis of which the Private Limited Company processes Client data and that are described in the present rules (hereinafter referred to as the Rules).

An Authorized Processor is each natural and legal entity that processes Client data on behalf of a responsible processor.

A Responsible Processor is each natural or legal entity that exclusively or together with others determines the objectives and tools for the processing of Client data. In accordance with the present Rules, the responsible processor is the Company.

Webpage of the Private Limited Company - cvpro.ee

Legal Acts that regulate data protection are all legal acts in the field of data protection that must be observed by the Private Limited Company, including the General Data Protection Regulation (GDPR) of the European Union as well as national legal acts that ensure the performance of the Regulation.

Regulations are all legal acts, prescriptions, and guidelines that are applicable to the Private Limited Company, including the legal acts that are related to the prevention of money laundering, taxes, accounting, and financing.

1. GENERAL PROVISIONS

1.1. The present rules explain and provide information about how the Company collects, saves, uses, and protects personal information of a User/Client. You accept the present Rules at the start of using the services of the Private Limited Company, entering into business relations with the Private Limited Company. Hereby you must also follow legal acts in your jurisdiction.

1.2. The protection of your personal information is our priority. The present document determines the procedure for using confidential information, also the procedure for collecting and using your personal data. You give your consent to the methods of processing your data that are described in the present document, by activating the relevant symbol ✓ after familiarizing yourself with the present rules.

1.3. The Private Limited Company must guarantee the safety of your information and manage it in accordance with our legal obligations established in relevant acts of the Republic of Estonia and Personal Life and Personal Data Protection Act of the European Union. The Company uses your personal data only in accordance with the present Privacy Policy and the applicable legislation of the Republic of Estonia. The Company may also collect anonymous demographic data that are not unique for you.

1.4. The Company does not collect any personal information about you if you do not provide us with it voluntarily. But still we can ask for some specific personal information/data from you if you decide to use specific services that are available on the Webpage.

They can be:

- first name and surname;
- address;
- phone number;
- e-mail address;
- description / name of service;
- other data/information that you provide us with while using:
 - our webpage cvpro.ee;
 - our mobile application;
 - our accounts in social networks, e.g. Facebook, LinkedIn etc.

- while communicating with us by phone or e-mail, or using some other means of communication, in the course of which you provide us with data/information completely voluntarily;
- data about reliability and required discretion, e.g. data about financial behaviour;
- data that enable the Private Limited Company to implement with required discretion the measures in order to prevent money laundering and the financing of terrorism, also to follow international sanctions, including the goal of business relations and the conformity of a client with the status of a person of political importance;
- data about the origin of property, e.g. about business partners and entrepreneurial activities of the Client.

The data that we obtain in the course of a client using our services:

- data from third parties
- data collected by default
- cookie-files and similar technologies (e.g. Google Analytics)
- devices/equipment (e.g. IP-address)
- logs
- Providers of advertising technologies
- Disclosure

How we use your personal data:

The Company may use your personal data in order to:

- create and manage the accounts opened upon registration, the usage of services, or making purchases;
- verify your identity and access to our services;
- to provide you with technical and customer support;
- to communicate with you and manage your participation in the service;
- to evaluate our products, services, and webpages;
- to provide you with adaptable experience while visiting our webpage;
- to provide you with services;
- to issue invoices;
- to ensure our exercise of legal rights or compliance with legal requirements;

1.5. We save your data only until we need it in order to achieve the goals we have registered and used the data for. For example: in accordance with the the Money Laundering and Terrorist Financing Prevention Act, we may preserve the copies of documents that verify the identity of a client, the data that verify the identity of a beneficiary, other data obtained at the moment of Client identification as well as the documents that are related to an invoice and/or a contract (original copies) within five years after closing a transaction or terminating business relations with a client. This term may be extended by up to two years.

1.6. We do not collect sensitive information.

2. ACCEPTING THE RULES OF THE COMPANY

2.1. By using the webpages and/or services of the Private Limited Company, you confirm that you have read these Rules and understood them. The Company reserves the right to update the present Rules at any moment in time, publishing the updated version on the webpage, and assumes that you have read and understood the latest version every time when you are using the webpage or the services provided by the Company via the webpage. We recommend that you check our webpage from time to time in order to read the latest information about our methods aimed at ensuring confidentiality.

3. EXCHANGING INFORMATION WITH THIRD PARTIES

3.1. The Company may share the data with reliable partners in order to help carry out statistical analysis, send you regular or electronic mails, ensure customer support or arrange document delivery. All of those third parties are forbidden to use personal information by any other means rather than for the purpose of service provision to the Private Limited Company, and they must keep your information confidential.

3.2. The Company may disclose your personal information without notifying you about it in advance if it is required by law, or if the Company conscientiously believes that it needs to be done:

- (a) in accordance with legal requirements for the purpose of service provision on the webpage;
- (b) in order to protect the right of ownership of the Company, and/or
- (c) in order to act under extreme circumstances for the purpose of protection of the personal safety of the clients of the Private Limited Company or the safety of the society.

We may transfer the personal data that we have at our disposal:

- to other partner companies (affiliated commercial undertakings);
- *(We may transfer personal data to other commercial undertakings (affiliated companies) only if it is required for the purpose of providing professional services to Company Clients).*
- to third parties that provide data processing and IT services to the Private Limited Company;

- to credit and payment institutions for the purpose of verification and authentication of bank account authenticity.

3.3. The Company uses other organisations for support upon service provision and also upon IT-system transfer, launch, and management inside the Company. For example, the suppliers of information technologies and cloud software as service providers at the time of management, identification, webpage accommodation and administration, data analysis, data back-up, also safety provision and data storage. The servers that guarantee and simplify the operation of cloud infrastructure are located in protected data processing centres all around the world. Personal data can be saved in any of them. Commercial undertakings, where your personal data may be transferred for the purpose of performance of agreements, entered into with the client, and service provision:

- Third parties that in some other way help us to provide goods, services, or information;
- Auditors, attorneys, and other professional consultants;
- Legal defence institutions and other government and regulatory bodies or other third parties, in accordance with requirements and applicable laws and regulations.

3.4. We may get enquiries from third parties that are authorized to disclose personal data (the Finance Inspectorate, etc.) with the aim of verifying the conformity of the activities of the Company to valid legislation and local regulations, investigate crimes and implement and protect the legal rights of our clients. We comply with the requests to transfer personal data only when it is permitted in accordance with the valid legislation and regulations.

3.5. The Company may monitor the webpages of our users in order to decide what kind of services are most popular. Such data is used by the Private Limited Company in order to send personalised contents and advertisements to such clients, whose behaviour indicates that they are interested in certain topics.

3.6. The Private Limited Company may collect the information about your computer and software by default. This information may include your IP-address, browser type, domain names, access time, and webpage addresses that you refer to. This information is used in order to guarantee the functioning of a service, to maintain the quality of service, also to prepare the general statistics of using the webpage of the Private Limited Company.

3.7. CV Pro OÜ may gather information and share it with third parties to enhance website functionality and analyze data, utilizing services such as:

- Google Site Search
- Facebook Remarketing
- Google Ads Remarketing
- Google Analytics Remarketing
- LinkedIn Website Retargeting
- Facebook advertising
- Google+ social plugins
- Instagram advertising
- Facebook social plugins
- LinkedIn advertising
- LinkedIn social plugins
- YouTube social plugins
- Google Tag Manager
- Facebook Analytics
- Google Ads
- Google Analytics
- Google Website Optimizer etc.

IV. YOUR RIGHTS

4.1. You have the right to obtain the information about what kind of personal data we have registered and are using and why. You can obtain the information about how long we save the data and also about who may see your data to the extent that we disclose it in. Your right of access may be limited by legislation, the protection of private life of other persons and with due consideration of our activities and practices. Our know-how, business secrets, and also financial estimates and materials may also be inaccessible for familiarization.

4.2. If the data is wrong, incomplete, or expired, you have the right to demand its correction.

4.3. The Company webpage is not meant for minors, and we do not deliberately collect data from children younger than 18 years old.

5. DATA PROTECTION

5.1. The Company invests a considerable number of resources to protect your personal data from loss, improper usage, unauthorized access, change, or disclosure. However, no Internet webpage is completely protected, and we do not bear responsibility for unauthorized or accidental access to information that is under our control.

5.2. The access to the information that allows to identify a person is only provided to the employees that need it in order to perform specific job tasks (e.g. to attorneys and to the internal audit department at the Company).

6. CONTACT DETAILS

6.1. If you have questions or wish to get more detailed information about our Privacy Policy and the procedure for processing your personal data, get in touch with us by e-mail address office@cvpro.ee.

6.2. The contact details of the Private Limited Company are available at our homepage cvpro.ee