## 1. Who we are

1.1 References in this Privacy Policy to "Applink," "Service," and "Website" refer to the Website available at www.applink.network, operated by LEADDEALER, LLC, a company under U.S. law, registration number 2017-000740537, registered address 412 N. MAIN STREET STE 100, BUFFALO, WY 82834 USA.

You may contact Applink's Privacy Officer by writing to info@leaddealer.net or by mailing a letter.

- 1.2 Applink is the Personal Data Operator with respect to Personal Data processed under this Privacy Policy.
- 1.3 An individual may become a Customer of Applink and use its facilities only if he/she is over 18 years of age or he/she is an adult according to the law of the state in which he/she resides if the age of majority in that state exceeds 18 years. Applink does not knowingly collect information (including Personal Information) and does not provide its services to persons under the age of majority.

Applink has the right to terminate any account if it is found that the account in question was created in violation of these provisions.

- 1.4 Applink is committed to ensuring the confidentiality of Customers' Personal Data and ensuring their security when using the Service. This Privacy Policy is intended to help the Customer understand what data and for what purposes the Service collects, and how the collected data is processed and protected.
- 1.5. Applink reserves the right to make changes to this Privacy Policy; the Customer of the Service is advised to check the Privacy Policy regularly. If this Privacy Policy changes, the Service will send a notice or email to the Customer about such changes. All changes in this Privacy Policy will be effective from the date of the last change. The Client who continues to use the Service after the changes in the Privacy Policy come into force is considered to have accepted and agreed to the new version of the Privacy Policy
- 2 Scope of the Privacy Policy
- 2.1 By registering for the Service, the Customer agrees to have his/her Personal Data processed by the Service in accordance with the provisions set forth below.
- 2.2 By registering for the Service, the Customer agrees to have his/her Personal Data anonymized for the purpose of using them in an anonymous form in order to improve the efficiency of the Service.
- 3. Data to be collected
- 3.1 By using the Service, the Customer agrees to the processing of the following data: 3.1.1 The data the Customer provides to the Service:
  - When creating an account, the Customer must provide the Service with at least login credentials (including a unique username and password combination for the Customer's account), as well as basic information necessary for the operation of the Service.

- When participating in the Customer account verification procedures: The Customer's personal information provided at the Service's request to identify the Customer.
- When participating in surveys or focus groups: evaluation of Applink services, as well as answers to questions from the Service.
- When sending a request through the Website: IP-address, email, phone number, name, payment information.
- 3.1.2 Data collected in the process of using the Service:

During Customer's use of the Website, the Website may collect data about the devices that Customer uses to access the Service (such as his/her IP address, device ID (including unique advertising device IDs such as Google Advertiser ID and IDFA), technical and statistical data (including Internet connection data, cell phone provider, Website usage data) and location data (based on Customer's separate consent).

- 3.1.3 Personal data received from third parties:
- 3.2 By providing Personal Data to Applink, Customer warrants that such data is true, accurate and up-to-date.
- 4. How we use Customer Information
- 4.1 Applink collects, processes and uses the Service's Customers' Personal Information on the following lawful grounds:
  - When such processing is performed for the purpose of performing a contract between the Service and the Customer;
  - When such processing is carried out on the basis of legitimate business interests of the Service:
  - When such processing is carried out with the prior consent of the Customer.
- 4.2 Applink collects and processes the Personal Data of Clients of the Service for the purpose of maintaining the functionality of the Service and ensuring compliance with the requirements established by law.

The Customer's Personal Data is processed for the following purposes:

- 4.2.1 When the processing of Personal Data is carried out for the purpose of executing the agreement between the Service and the Customer:
  - To create, manage and maintain the Customer's account and, if necessary, to interact with the Customer through the appropriate communication channels provided by the Customer when registering, carried out in connection with the Customer's use of their account;

- To analyze the Client's profile, actions within the Service, preferences and current location in order to improve the quality of services to the Client;
- To process and respond to requests received from the Client;
- For administrative purposes, such as password recovery, service notices

(including notifications about technical failures of the Website, changes in the Privacy Policy and User Agreement);

- 4.3.2. when the processing of Personal Data is based on legitimate business interests of the Service:
  - For the purpose of checking the Client's account, carried out in connection with unlawful actions performed by the Client, as well as to block the Client's accounts to investigate possible fraud;
  - to assess the effectiveness of marketing and marketing research and training of staff.
- 4.3.3 When the processing of personal data is carried out with the prior consent of the Customer:
  - For the purpose of providing and improving the Client's interaction within the Service by adding additional information to the Client's profile;
  - For the purpose of providing the Customer with targeted advertisements on the Website and optimization of advertising information according to the Customer's preferences (this function is used by Applink through third-party services.
  - In order to collect statistics on the Customer's use of the Service;
  - For the purpose of identifying possible technical defects in the operation of the Service, as well as

to promote research and development conducted by the Service team in order to improve the work of the Website.

- 5. How long we retain Customer Information
- 5.1 Applink will retain Customer Personal Information for the period of time necessary to perform the activities specified in Section 4 of this Privacy Policy and as required by law.5.2 In order to protect the interests of Service Customers, Applink will retain the Personal Data of Service Customers for 30 days (the retention period) after the Customer's account is deleted.
- 5.3 Applink reserves the right to retain the Customer's Personal Data for a longer period of time than specified in paragraph 5.1 when this is required by the Service to fulfill legal obligations

(including requests from law enforcement agencies, dispute resolution), to comply with requirements established by law, or when the relevant Personal Data is stored for legitimate business interests of the Service (including security and fraud prevention).

- 6. With whom we share Customer Information
- 6.1 Applink may share Customers' Personal Data with third parties in the following cases:
  - When Personal Data is shared with other Applink Customers:
  - The Customer shares information with other Applink Customers by voluntarily disclosing information within the Service (including, but not limited to, information in his/her profile). The Customer chooses the information he/she discloses within the Service at his/her own discretion. Applink is not responsible for how other customers of the Service may use the information disclosed by the Customer as part of the Service.
  - When personal information is disclosed to cloud service providers.
  - When personal data is transferred to security service providers.
  - When Personal Data is disclosed by law:

Applink may disclose Customers' Personal Data when necessary:

- To establish, exercise, protect or enforce the legal rights and interests of the Service;
- To comply with a court order, such as a court order, subpoena or search warrant;
- government/law enforcement investigations or other statutory requirements;
- to assist in the prevention and detection of crimes;

to protect a person's safety or vital interests.

- 6.2 Applink shall put in place appropriate mechanisms of contractual control over the service providers who process the Service Customers' Personal Data, ensuring that the rights of the Service Customers are respected, their Personal Data are protected, and appropriate security and confidentiality measures are taken.
- 6.3 In case the corporate structure of the Service changes, resulting in the transfer of the Service Customers' Personal Data to third parties, all Service Customers will be notified of the relevant changes by e-mail, as well as by a separate notification on the Service website (www.Applink.network). The relevant notice will specify the new operator of the Personal Data of Service Customers, as well as the possible options for the Customers to dispose of their Personal Data provided to the Service.

## 7. Customer Rights

7.1 Each Client of the Service is the subject of Personal Data and has the following rights regarding the Personal Data provided to the Service: