

PRIVACY AND PERSONAL DATA PROTECTION POLICY

UniverseFlow Ltd. (www.UniverseFlow.com) takes responsibility for maintaining a high level of protection and management of its users' personal data. The exact terms and details are specified within this policy.

1. Using personal data

Regardless of the user's country of legal residence or Internet connection being made, all of the personal data UniverseFlow Ltd.'s users supply to it can be used for:

- Improving the user experience in any of our webpages (personal data helps us cater to the individual needs of our users) to avoid sharing irrelevant information with them.
- Improving our webpages, keeping them up-to-date and managing user's access to the information we supply.
- Creating marketing campaigns to broadcast information about us, our products, services, share our good practices and useful information, and make special offers to our users, based on their interests.
- Improving the overall quality of our products and services.
- Keeping in touch with any of our users or customers.

2. Information users share with UniverseFlow

All data we collect from users is collected voluntarily via contact forms, containing both required and non-required fields. The categories of data we mainly collect are: *email, address, first name, last name, phone, postal address*. We might also ask for other data, related to the user's business and occupation – *company name, position, interests* etc.

3. Using Cookies

Cookies are small files which are stored on a user's computer. They are designed to hold a modest amount of data specific to a particular client and website, and can be accessed either by the web server or the client computer. This allows the server to deliver a page or an advertisement tailored to a particular user, or the page itself can contain some script which is aware of the data in the cookie and so is able to carry information from one visit to the website (or related site) to the next. Each user can decide whether they consent to using cookies, and each Browser might provide information when cookies try to get access to the computer. Thus, everyone can decide whether to use any cookie. On the other hand, users need to understand that some webpages require cookies to function properly and not using them might lead to poor browsing experience.

4. Sharing data with third parties

UniverseFlow Ltd. does not share or engage in trading with private data of any persons under any circumstances, except for the cases when it is legally obliged to do so to under European Union or Bulgarian laws. User data which is not considered 'private' does not have the same obligation from UniverseFlow.

5. Regulation compliancy (EU) 2016/679 (GDPR)

Under the 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 (General Data Protection Regulation) (Text with EEA relevance), UniverseFlow Ltd. has taken the required technical and organizational measures, consistent with the existing legal framework in the privacy protection field, in order to protect all private data shared by its users.

a. Storing and protecting user data

The data our users share with us under this policy might be stored on local, cloud and virtual servers, owned or rented by UniverseFlow Ltd. or by a company supplying UniverseFlow Ltd. with server services. In this case the data protection is guaranteed by the provider's corresponding

certificate/document attesting that their storage, protection and management of the data, as required by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR).

b. Confidentiality of data processing and usage

All people employed at UniverseFlow Ltd. with access to the user's data have signed a confidentiality agreement on personal data, guaranteeing that the said data may only be used in accordance with their work tasks and may not be shared in any other way.

c. Usage of external platforms and systems

UniverseFlow Ltd. makes use of external platforms and systems for management of its user's and customer's relationships. All customer data supplied by its users is stored on its servers in accordance with this agreement and under the existing legal framework.

For marketing purposes UniverseFlow uses the platforms listed below. Within them it collects, stores and manages personal data of its users:

- **MailChimp.com** – cloud system for marketing automatization, collecting user's data in accordance with GDPR-requirements of the Regulation (EU) 2016/679
- **Mautic.com** – cloud system for marketing automatization, collecting user's data in accordance with GDPR-requirements of the Regulation (EU) 2016/679
- **HubSpot.com** – cloud system for marketing automatization, collecting user's data in accordance with GDPR-requirements of the Regulation (EU) 2016/679

For administrative purposes UniverseFlow uses the platforms listed below. Within them it collects, stores and manages personal data of its users:

- **Google Drive** – cloud-based data storage platform, property of Google.com, for storage of user's data in accordance with GDPR-requirements of the Regulation (EU) 2016/679
- **pCloud.com** – cloud-based platform for storage of data, optimized in accordance with GDPR-requirements of the Regulation (EU) 2016/679

d. Management of personal data

For the data of all users from countries part of the European Union, UniverseFlow Ltd. operates in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR) when it comes to *collecting, using, storing and managing* the user's data. With regard to this, UniverseFlow attests that it has created the required technical and organizational mechanisms and frameworks to fit the regulation's requirements for: *giving notice, acquiring consent, providing access, storage and a possibility for personal data erasure* for every user. If any user needs or wants to have access, make an inquiry or a complete removal of their personal data, they may contact a UniverseFlow Ltd.'s representative or send a request via our channels for contact, listed in the "Contacts" section.

e. Terms for data storage

UniverseFlow Ltd. stores the personal data its users have supplied with their explicit consent for an **unlimited period** of time, unless legally obliged to do else. If any user decides to unsubscribe from a specific contact group or segment (in the context of UniverseFlow's marketing and administrative categorization), their data remains in storage within the specific system, without being used in a marketing communication, targeted at that particular contact group or segment. If a request for full personal data removal is made, the corresponding UniverseFlow's representative is obliged to quickly and fully erase all data from the systems, contact groups, marketing segments and databases where the user's data exists.

6. Agreement with this Policy

Each and every user who uses the Internet page of UniverseFlow Ltd. consents with this privacy and personal data protection policy.

When UniverseFlow establishes contact with a potential user via a campaign, their consent is always required with the relevant technical instruments.

7. Changes in this Policy

All changes within this policy are going to be published on our main webpage (www.UniverseFlow.com) in a timely manner.

8. Contacts

You might ask us about our privacy and personal data protection policy by email or direct contact on working days. See below

E-mail: office@universeflow.com

Phone: +359 888 268224; +359 887 584374

Working time: Monday - Friday: 9:30 – 17:00