

**PRIVACY POLICY**  
**COMMERCE CLOUDSOFT LTD**

**Commerce CloudSoft LTD**, 6 Burrows Court, Liverpool, United Kingdom, L3 6JZ (the "Company") is the owner of the informational resource MLC.Health and operates as the manager of the investment informational platform. This platform provides a service that offers opportunities to access information and participate in projects related to the development, research, and introduction of innovative products to the international market.

We adhere to high standards of security and confidentiality to ensure the reliable protection of your personal information. This Privacy Policy (the "Policy") is designed to provide you, as our user ("you"), with a clear understanding of how the Company processes your data at every stage – from collection and use to disclosure, storage, and protection. Our primary goal is to guarantee transparency in all procedures and to ensure the reliable safeguarding of your data.

Your use of our platform and the Company's services signifies your consent to the collection, use, and storage of your personal data in accordance with the provisions of this Policy. Furthermore, by using the Company's services, you automatically agree to the terms outlined in our Platform Usage Rules. We recommend that you carefully review these Rules and accept their terms before continuing to use our platform and services.

Our mission is to host projects and developments that are potentially important for society and public health, which can help improve the quality of life for the population and offer a broad range of people the opportunity to increase their income, regardless of salary level, inflation, or economic crisis.

We, Commerce CloudSoft LTD, a company registered under the laws of the United Kingdom with registration number 15980669 and located at 6 Burrows Court, Liverpool, United Kingdom, L3 6JZ, act as the operator of the platform.

## **1. CONTROLLING AND PROCESSING PERSONAL DATA ENTITY**

Commerce CloudSoft LTD acts as the Controlling and Processing entity for your personal data. We strive to ensure maximum transparency in handling your data, and this Policy is designed to keep you fully informed about our principles and methods of data management.

By providing us with your personal data, you agree to its processing in accordance with this Policy and confirm your consent to receive informational messages and notifications from the Company. We process your data in the following cases:

- when you visit our platform;
- when you fill out application forms on the platform;
- when registering to access services or products through the platform or our websites and networks;
- to improve the quality of services and products we provide;
- to offer customer support and address technical issues;
- for conducting marketing research and analyzing user behavior;
- to comply with current legal requirements and regulations.

In case of a breach of the conditions of this Policy, your access to the platform and Company services may be temporarily restricted until the completion of an internal investigation.

If you believe that the content of the platform does not align with your moral or ethical principles, you may cease using it and refrain from future visits.

## 2. BASIC PRINCIPLES OF PERSONAL DATA PROCESSING

You acknowledge that your use of the platform and Company services is subject to the following basic principles:

- 1) The use of the platform and the services provided must comply with their intended purpose;
- 2) Access to and use of the platform must strictly adhere to this Policy, the Company's Platform Usage Rules, and applicable laws;
- 3) You are obliged to provide accurate and complete information about yourself and any individuals you represent;
- 4) You must refrain from actions that are explicitly prohibited by this Policy.

The Company processes personal data exclusively on lawful and fair grounds. We do not share or disclose your personal data to third parties without your consent, except in cases stipulated by applicable legislation or the direct objectives of the Platform as outlined in the Rules.

Before commencing the processing of personal data, including its collection, the Company clearly defines and formulates the legitimate purposes of such processing. The data processing procedure is strictly limited to achieving these goals, ensuring transparency and accountability in the protection of user data.

## 3. DEFINITIONS

The following key definitions are established to ensure clarity of terminology and to help users better understand how their data is collected, processed, and protected within the Company's activities:

- 1) Personal Data or Personal Information** – any information that allows for the direct or indirect identification of an individual or legal entity. This includes, but is not limited to, details such as name, surname, date of birth, email address, profession, gender, as well as other data related to a specific individual or organization, including legal address and contact information.
- 2) Processing of Personal Data** – any operations performed with personal data, including collection, recording, systematization, accumulation, storage, updating (clarification, modification), retrieval, usage, transfer (distribution, provision, access), anonymization, blocking, deletion, and destruction, regardless of whether automated means are used or not.
- 3) Controller** – a person or organization that determines the purposes and methods of processing personal data, acting independently or in cooperation with others.
- 4) User or Client** – an individual aged 18 years or older using the platform, or a minor with the consent of legal representatives, as well as a legal entity.

**5) Commerce CloudSoft LTD** – a company registered under the laws of the United Kingdom with registration number 15980669 and located at 6 Burrows Court, Liverpool, United Kingdom, L3 6JZ, represented on the platform: MLC.Health.

**6) Personal Data Information System** – a set of databases containing personal data, as well as information technologies and technical means used for processing them.

**7) Agreement** – an arrangement between the Company and the client for the provision of services, executed in written or electronic form.

**8) International Transfer of Personal Data** – the process of transferring data to governmental authorities, individuals, or legal entities located outside the country where the data was originally collected.

#### 4. COLLECTION OF PERSONAL DATA

The Company makes every effort to collect only the information necessary to provide quality services, avoiding the collection of excessive personal data. All relationships with Users are regulated by the terms of the Platform Usage Rules and other documents posted on the platform: MLC.Health.

YOU CONFIRM THAT YOU HAVE ASSUMED FULL RESPONSIBILITY FOR PROVIDING CONSENT TO COMMERCE CLOUDSOFT LTD FOR THE USE OF YOUR PERSONAL DATA FOR THE EFFECTIVE PROVISION OF SERVICES THROUGH THE PLATFORM AND FOR FULFILLING ALL SERVICE OBLIGATIONS.

UNLESS OTHERWISE SPECIFIED, CONSENT IS IMPLIED UPON VISITING THE PLATFORM OR BY CONTACTING THROUGH THE DETAILS PROVIDED ON THE PLATFORM MLC.Health.

When using the Company's products and services, you may provide us with additional information about yourself. We may also collect data about your behavior on the platform and combine it with information from other users to improve the quality of our services.

The information we may collect about you as a user of the platform, products, or services of the Company includes:

**1) Personal Data:** your first name, last name, patronymic; login and password; mailing address and postal code; email address; phone number; IP address used for internet access; computer and connection data (browser type, version, time zone settings, browser plug-in types and versions, operating system, and platform); preferred language; internal user identifier; date of birth; passport number or other identification document; social media ID; browsing history; data from the "Send Data via SMS" and "Plot Route" features; information about the start and duration of user sessions on the platform; data on user actions during sessions; biometric data (e.g., user photographs).

**2) Additional Information:** data that may not directly identify you but could include demographic details, platform usage, and aggregated data related to platform functionality. We may collect this information from both registered and unregistered users.

**3) Mobile Device Data:** information about your location, which we may obtain through third-party services. You can limit access to this data if you prefer not to share it. To disable geolocation features, please refer to the instructions provided by your mobile operator or device manufacturer.

**4) Information from Third Parties:** details about you that may be provided to us by third parties. If we combine such data with information collected through our platform, this information will be processed in accordance with this Policy.

**5) Information about a Legal Entity:** name, address, website, and contact details of its representative.

By using the Platform, its functionality, and the Company's services, you agree to the collection of your personal information and consent to receiving emails, including information used in marketing communications to promote the Company's products or similar services. You have the right to withdraw your consent at any time by using the unsubscribe link contained in every email we send.

## 5. USER REQUIREMENTS FOR THE PLATFORM

To access and use the platform, as well as independently use the Company's products and services, you must be at least 18 years old or be of legal age according to the laws of your country of citizenship or residence where you use the Company's services. If you are under 18, you may use our services only with the permission of your legal representative.

If, despite reaching the age of 18, you are still considered a minor under your country's laws, you must obtain consent from your legal representative to use the platform and the Company's services. Your legal representative should review the terms of this Policy and officially accept them on your behalf.

If you are an individual acting as a representative of a legal entity, you must be duly authorized by that legal entity to carry out actions on the platform.

The Company reserves the right to conduct investigations in cases of attempts to use the platform by individuals without the appropriate authorization from the legal entities they represent and may restrict or block access to the platform and the Company's services for such individuals.

The Company is not responsible for actions taken by third parties aimed at fraud or falsification of user identification data. Any attempt to gain unauthorized access or use the platform through fraudulent or illegal methods is the sole responsibility of those who commit such actions.

## 6. PROCESSING OF PERSONAL DATA

The Company processes your personal data in strict accordance with UK legislation, international information protection standards, as well as the provisions of this Policy and the Company's Rules. Personal data is processed exclusively for the following purposes:

- verifying the identity of platform users;
- sending notifications regarding security and confirming performed actions;
- communicating with users in their preferred language;
- customizing platform content and functionality to enhance user experience;

- managing and administering project accounts on the platform;
- processing inquiries and providing responses from the Company;
- organizing marketing and advertising campaigns;
- conducting surveys and questionnaires to improve service quality;
- collecting and analyzing statistical data for internal research;
- improving the quality of services provided;
- developing and enhancing products and services;
- fulfilling legal obligations and preventing fraudulent activities;
- fulfilling contractual obligations to clients;
- ensuring access to platform functionality;
- protecting information security and user data.

These measures guarantee that your personal data is used solely for necessary purposes, adhering to all security and confidentiality standards.

Your consent also allows us to share your data with third parties in the following situations:

- 1) in response to legitimate requests from government authorities and law enforcement agencies;
- 2) to protect our legal rights, including during legal and other official proceedings;
- 3) if disclosure is required to prevent physical harm, financial loss, or to combat illegal activities and fraud.

Please note that the listed purposes of data processing are not exhaustive. All purposes for which we process your data will be reflected and made available in the updated version of this Policy.

We actively and responsibly use the collected information to ensure and improve the quality of services provided, to process your requests, prevent fraudulent activities, and to deliver relevant information and advertising that may be of interest to you, while strictly complying with applicable laws and regulatory requirements.

## **7. INTERNATIONAL TRANSFER OF PERSONAL DATA**

The Company strictly adheres to the data protection regulations of the United Kingdom, ensuring an appropriate level of security for your personal data within the UK. We implement all necessary safeguards to guarantee compliance with the highest global standards for personal information protection, in accordance with UK law and other applicable international requirements.

As an organization operating under UK legislation, we store your information on servers located within the UK. As part of our global activities, we may transfer and provide access to personal data in countries where the data protection level is comparable to that of your country, or in accordance with another required level of security, aligned with the previously stated purposes. This Policy remains valid and applicable even in the case of data transfers beyond national borders.

We ensure that all international data transfers are conducted with appropriate protection measures, in compliance with UK data protection laws and other applicable legal requirements. If you need further information about the safeguards in place, please contact us using the details provided below.

When transferring personal information to third-party service providers, partners, or other entities outside the UK, we follow established procedures, adhering to UK data protection standards and the laws of the countries where our partners' servers are located. This ensures the secure handling of your data, regardless of its location. During international data transfers, we apply strict protective measures in line with this Policy.

For individuals subject to UK law, when transferring data to countries or territories outside the UK that do not ensure an adequate level of protection, we utilize the necessary data transfer mechanisms to ensure the safety of your information. We closely monitor the implementation of these measures to guarantee that any transferred data is securely protected in accordance with our high-security standards.

## **8. UPDATING PERSONAL DATA AND RESPONSIBILITY FOR ITS ACCURACY**

If your personal information that you have provided to us has changed, such as if you have changed your email address or wish to withdraw a previously submitted request, please notify us by contacting the platform's support service. We are not responsible for any losses incurred as a result of you providing inaccurate, incomplete, false, or outdated information.

## **9. USERS' RIGHTS REGARDING PERSONAL INFORMATION**

You have certain rights concerning your personal information that we process. These rights include:

**1) Right to Information and Access:** You have the right to inquire whether your data is being processed and to access the information we hold. However, in certain cases, we may refuse access to data if it is required by law or if the information is legally protected.

**2) Right to Rectification:** You can request the updating or correction of inaccurate or incomplete information related to you.

**3) Right to Erasure:** Under specific circumstances, you can request the deletion of your information. However, we may refuse deletion if there are legal grounds for retaining it.

**4) Right to Restriction of Processing:** You may request the limitation of the processing of your information in particular situations, although we may continue processing if there are legal grounds to do so.

**5) Right to Withdraw Consent:** You have the right to withdraw your consent to data processing, which will not affect the lawfulness of data processing carried out before the consent was withdrawn.

To exercise your rights, please contact us via the email address provided in this Policy.

## **10. INTERACTION WITH CONTRACTORS AND PARTNERS**

We collaborate with various advertising agencies, technological contractors, payment agents, partners, and innovative projects that assist us in analyzing and tracking users on our platform, as well as providing services on the Platform. These third-party partners may use technologies to display advertisements that might be of interest to you. You have the option to opt out of such advertising, but

please note that we do not control the content of external advertising materials and cannot guarantee their absence on the platform. Partners may place their own information, functionality, and projects on our platform.

## **11. USE OF AUTOMATED TECHNOLOGIES AND PROFILING**

We actively utilize automated tools, including profiling technologies, to optimize your experience with our services and enhance satisfaction with using our offerings. These solutions enable us to tailor platform content and proposals according to your individual preferences, based on your behavior, browsing history, and viewed advertisements.

## **12. USE OF COOKIE FILES AND SIMILAR TOOLS**

We use cookie files and other similar tracking technologies to activate the core functions of our Company's Platform. Cookie files are small text files that the platform employs to recognize repeat visits, ensuring seamless access to the platform and enhancing its usability. These files also allow us to track user sessions and analyze how visitors interact with the platform, helping us improve the quality of services provided. For more detailed information about our use of cookie files, please refer to our Cookie Policy available on the platform.

## **13. TRANSFER OF PERSONAL INFORMATION**

We handle the processing of your personal data with great care and are committed not to share it with third parties, except when it is necessary for the provision of Company services or for conducting our business operations in line with established objectives. We may disclose your data in the following circumstances:

- when required by law;
- in the context of legal proceedings or in anticipation of such proceedings;
- to protect our legal rights, including preventing fraud or reducing financial risks;
- to companies whose information has been requested by the user;
- to third parties in the case of a merger, restructuring, joint venture, transfer of rights, or the sale of our business in whole or in part.

We may also share your data with trusted partners to contact you upon your request, assist in statistical analysis, or provide customer support. These third parties are obligated to use your data exclusively for the specified purposes and maintain its confidentiality. If you prefer that we do not share your data with such organizations, please contact us.

Additionally, we may transfer your data to companies represented by their representatives on our platform when you request information via SMS messages. The data transferred may include your first name, last name, phone number, email address, and time of the request. We collaborate with other companies and individual specialists to provide services to our clients, which may include data analysis and offering additional services. In all cases, we require our partners to strictly adhere to this Policy when processing your information.



## 14. ENSURING THE SECURITY OF PERSONAL DATA

We take all possible measures to protect your personal data, and for this purpose, we have developed a comprehensive data security system that includes legal, organizational, and technical aspects:

**Legal Protection:** Involves a set of regulations and procedures aimed at creating, maintaining, and developing the data protection system;

**Organizational Protection:** Regulates data security management, including access control and interaction with partners and external organizations;

**Technical Protection:** Includes the use of modern technologies and software tools that provide reliable data protection.

The main data security measures include:

- Appointing a person responsible for data processing;
- Conducting data security risk assessments and implementing appropriate protective measures;
- Developing and maintaining a data processing policy;
- Using unique access passwords for employees according to their responsibilities;
- Applying verified information security tools;
- Regularly updating antivirus software;
- Protecting data from unauthorized access;
- Responding promptly to information security incidents;
- Conducting internal audits and checks.

Your account data is also protected by a password and stored in a secure database with restricted access. We recommend you take additional measures to protect your data, including using strong passwords and ensuring the security of your devices.

## 15. RETENTION PERIODS FOR PERSONAL INFORMATION

We retain your data for as long as necessary to fulfill the purposes for which it was collected. The main factors determining the retention period include:

- legal requirements;
- the presence of legal grounds for retaining the data;
- a request to cease data usage if you are no longer our client or your legal representative.

You may request data deletion at any time by contacting us using the details provided in this Policy. Even after closing your account, we may retain certain data to fulfill legal obligations, resolve disputes, and comply with contractual commitments. Data will be deleted once it becomes irrelevant or after 5 years from the last interaction with our services, whichever comes first.

## 16. YOUR RIGHTS REGARDING PERSONAL INFORMATION

We recognize your right to privacy and provide you with the ability to control the processing of your personal data. You have the right to:

- withdraw consent for data processing, request deletion, or correction by sending a request to the specified email address;
- restrict data processing if you believe it is being processed unlawfully or is inaccurate;
- object to data processing by sending an objection to the specified email address;
- request access to your data or its correction, except in cases provided by law, with an explanation of the reasons for refusal;
- obtain your data in a digital format for further use or transfer.

If you wish to know what data we hold or how it is used, we will provide this information upon request.

## 17. COMMUNICATION METHODS

We reserve the right to contact you through various channels provided during registration or while using our services, including:

- emails and push notifications to inform you about bookings or upcoming events;
- phone calls to notify you of additional services;
- emails containing information about transactions, special offers, or administrative notifications.

We may also use push notifications through the platform to convey important alerts or current information. All communications from the Company will be sent to the addresses or contact details you provided, in accordance with your preferences. If you wish to change your notification settings or opt out of certain types of notifications, you can do so in your account settings or by contacting us.

## 18. EXTERNAL LINKS AND THIRD-PARTY RESOURCES

Our platform may contain links to third-party resources. We do not control the content of these sites and are not responsible for their information security practices or data processing procedures. The presence of such links does not imply that we endorse or approve their content, services, or owners. This Policy does not apply to external websites, and we recommend that you review their privacy policies.

## 19. UPDATES TO THIS POLICY

We continuously improve our services to provide you with a higher quality experience; therefore, this Policy may be updated periodically to reflect changes in UK legislation and international requirements. We recommend regularly checking this page to stay informed about any changes. In the event of significant modifications, we will inform you by posting the new version of the Policy on the platform and sending a notification to your email address. By continuing to use our platform and services after receiving such notifications, you confirm your acceptance of the updated Policy.

If you have any questions or complaints regarding this Policy or the processing of your data, please contact us: **Through the platform: MLC.Health; By email: company@mlc.health.**