

# PRIVACY POLICY

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LASKVILLE LLC is committed to protecting the privacy of its users and we therefore ask you to read our Privacy Policy before providing us with any information about you or any other person.

This policy (together with our terms of use available at [www.whatsonpic.io](http://www.whatsonpic.io) ("Website") and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Please read the Policy carefully, in order to get full understanding of our policies and practices regarding your information.

By visiting the Website, you are accepting and consenting to the practices described in this policy.

## 1. DATA CONTROLLER (OWNER)

LASKVILLE LLC ("WhatsOnPic", "we", "us"), a legal entity duly incorporated in accordance with the legislation of the Russian Federation. Place of data processing is the Russian Federation.

Owner contact email: [info@whatsonpic.com](mailto:info@whatsonpic.com)

## 2. DEFINITIONS

**Personal Data (or Data)** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier of that natural person.

**Usage Data** means information collected automatically through WhatsOnPic (or third-party services employed in WhatsOnPic), which can include: the IP addresses or domain names of the computers utilized by the Users who use WhatsOnPic, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within WhatsOnPic) and the details about the path followed within WhatsOnPic with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

**User** means an individual using WhatsOnPic who, unless otherwise specified, coincides with the Data Subject.

**Data Subject** means a natural person to whom the Personal Data refers.

**Data Processor** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Data Controller, as described in this Privacy Policy.

**Data Controller** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of WhatsOnPic. The Data Controller, unless otherwise specified, is the Owner of WhatsOnPic.

**Processing** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Third party** means a natural or legal person, public authority, agency or body other than the Data Subject, Controller, Processor and persons who, under the direct authority of the Controller or Processor, are authorized to process Personal Data.

**Consent** of the Data Subject means any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of Personal Data relating to him or her. Please be informed that your Consent includes also the consent for the cross-border transmission of your Personal Data to the United States of America and other countries specified in the present document.

**Cookies** mean small piece of data stored in the User's device.

### 3. INFORMATION WE COLLECT FROM YOU

We will collect and process the following data about you:

**Information you give us.** This is information about you that you give us by filling in forms on the Website or by corresponding with us by phone, e-mail or otherwise. The information you give us includes First Name, Last Name, Address, Identification Document (Proof of Identity), Picture.

**Information we collect about you (Usage Data).** With regard to each of your visits to the Website we will automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type

and version, time zone setting, browser plug-in types and versions, operating system and platform;

- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number.

**Information we receive from other sources.** We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) who may provide us information about you.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this Privacy Policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using WhatsOnPic.

Unless specified otherwise, all Data requested by WhatsOnPic is mandatory and failure to provide this Data may make it impossible for WhatsOnPic to provide its services. In cases where WhatsOnPic specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools – by WhatsOnPic or by the owners of third-party services used by WhatsOnPic serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are solely responsible for any third party Personal Data obtained, published or shared through WhatsOnPic and confirm that they have the third party's consent to provide the Data to the Owner.

**IMPORTANT NOTICE:** WhatsOnPic does not collect any information on your transactions and/ or your credit cards and/ or your accounts. When you are redirected to the website of a shop, you provide all information to the owner of the shop website and not to WhatsOnPic.

## 4. HOW THE DATA IS COLLECTED

We use different methods to collect the Data from and about you including through:

- Direct interactions. You may give us your Personal Data as described in this policy by registering, filling in forms or by corresponding with us by post, phone, email or otherwise.

It is important that the Personal Data you provided us is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

- Automated technologies or interactions. As you interact with WhatsOnPic, we may automatically collect Usage Data.

## 5. PURPOSES OF THE PROCESSING

We process your Personal Data for the following purposes:

1) to provide WhatsOnPic Services, namely: Registration and authentication, Analytics, Social features, Commercial affiliation, Hosting and backend infrastructure, Infrastructure monitoring, Interaction with external social networks and platforms and Interaction with support and feedback platforms;

2) to contact you with information, notices, special offers and other information we believe will be of interest to you. Please take into account that when you create WhatsOnPic account, your email address will automatically be added to our emailing lists.

3) to improve the content, functionality and usability of WhatsOnPic, to better understand your needs and interests;

4) for security or fraud prevention purposes, for the purposes of KYC practices; and

5) for any other purpose identified in an applicable agreement between you and us upon your prior Consent.

## 6. MODE AND PLACE OF PROCESSING THE DATA

### 6.1 Methods of Processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

Processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types

of persons in charge, involved with the operation of WhatsOnPic (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

## 6.2 Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.
- In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

## 6.3 Place

The Data is processed at the Owner's operating office in the US and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public

international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

## 6.4 Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

## 6.5 Detailed information on the Processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

### 6.5.1 Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

Google Analytics (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – [Privacy Policy](#) – [Opt Out](#)

MixPanel (MixPanel)

MixPanel is an analytics service provided by Mixpanel Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – [Privacy Policy](#) – [Opt Out](#).

### 6.5.2 Commercial affiliation

This type of services allows WhatsOnPic to display advertisements for third party products or services and links to the online shops where the products tagged on the pictures can be purchased.

IMPORTANT NOTICE: when you click on a third party advertisement or link to a third party website, you are redirected to a corresponding website. These websites and services have their own privacy policy. We do not bear any responsibility for third party websites and/ or services, links to which are represented on WhatsOnPic.

Ads can be displayed either as advertising links or as banners using various kinds of graphics.

Clicks on the icon or banner posted on WhatsOnPic are tracked by the third party services listed below, and are shared with WhatsOnPic.

For details of which data are collected, please refer to the privacy policy of each service.

Skimlinks (Skimbit Ltd)

Skimlinks is a commercial affiliation service provided by Skimbit Ltd.

Personal Data collected: Cookies and Usage Data.

Place of processing: UK – [Privacy Policy](#)

VigLink (VigLink, Inc.)

VigLink is a commercial affiliation service provided by VigLink, Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – [Privacy Policy](#)

### 6.5.3 Hosting and backend infrastructure

This type of services has the purpose of hosting data and files that enable WhatsOnPic to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of WhatsOnPic. Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

Amazon Web Services (AWS) (Amazon)

Amazon Web Services is a hosting and backend service provided by Amazon.com Inc.

Personal Data collected: various types of Data as specified in the privacy policy of the service.

Place of processing: See the Amazon privacy policy – [Privacy Policy](#).

### 6.5.4 Infrastructure monitoring

This type of services allows WhatsOnPic to monitor the use and behavior of its components so its performance, operation, maintenance and troubleshooting can be improved.

Which Personal Data are processed depends on the characteristics and mode of implementation of these services, whose function is to filter the activities of this Application.

New Relic (New Relic)

New Relic is a monitoring service provided by New Relic Inc.

The way New Relic is integrated means that it filters all traffic of this Application, i.e., communication between the Application and the User's browser or device, while also allowing analytical data on this Application to be collected.

Personal Data collected: various types of Data as specified in the privacy policy of the service.

Place of processing: US – [Privacy Policy](#)

### 6.5.5 Interaction with external social networks and platforms

This type of services allow interaction with social networks or other external platforms directly from the pages of WhatsOnPic.

The interaction and information obtained through WhatsOnPic are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it.

Facebook Like button and social widgets (Facebook, Inc.)

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook, Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – [Privacy Policy](#)

Twitter Tweet button and social widgets (Twitter)

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – [Privacy Policy](#)

Pinterest “Pin it” button and social widgets (Pinterest)

The Pinterest “Pin it” button and social widgets are services allowing interaction with the Pinterest platform provided by Pinterest Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – [Privacy Policy](#)

Instagram Like button (Instagram)

The Instagram Like button is a service allowing interaction with the Instagram social network provided by Instagram Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – [Privacy Policy](#).

## 7. HOW WE USE THE INFORMATION WE COLLECT ABOUT YOU

**Information you give to us.** We will use this information:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- to comply with applicable laws and legislation, following KYC policies and regulations;
- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;

- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer.

We store the information you give to us using the following provider: SwiftDil (Privacy Policy and Terms and Conditions of this provider are available at the website: <http://www.swiftdil.com/>)

**Information we collect about you.** We will use this information:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to comply with applicable laws and legislation;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of the Website about goods or services that may interest you or them.

**Information we receive from other sources.** We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

## 8. DISCLOSURE OF YOUR INFORMATION

You agree that we have the right to share your personal information with any member of our group, which means respective past, present and future employees, officers, directors, contractors, consultants, equity holders, suppliers, vendors, service providers, parent companies, subsidiaries, affiliates, agents, representatives, predecessors, successors, and assigns (the "Team"); selected third parties including business partners, suppliers, and sub-contractors for the performance of any contract we enter into with them or you.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If the Company or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use of the Website and other agreements; or to protect the rights, property, or safety of the Company or our Team, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

## 9. YOUR RIGHTS

As a User, you have the right to do the following:

- Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- Object to processing of your Data. Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- Access your Data. Users have the right to learn if the Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- Verify and seek rectification. Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- Restrict the processing of your Data. Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- Have your Personal Data deleted or otherwise removed. Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.

- Receive your Data and have it transferred to another controller. Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- Lodge a complaint. Users have the right to bring a claim before their competent data protection authority.

### **9.1 Details about the right to object to processing**

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

### **9.2 How to exercise these rights**

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

## **10. ADDITIONAL INFORMATION ABOUT DATA COLLECTION AND PROCESSING**

### **10.1 Legal action**

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Application or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

### **10.2 Additional information about User's Personal Data**

In addition to the information contained in this Privacy Policy, WhatsOnPic may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

### 10.3 System logs and maintenance

For operation and maintenance purposes, WhatsOnPic and any third party services may collect files that record interaction with WhatsOnPic (System logs) use other Personal Data (such as the IP Address) for this purpose.

## 11. USE OF COOKIES AND SIMILAR TECHNOLOGIES

### 11.1 Cookies.

A cookie is a piece of information in the form of a very small text file that is placed on an Internet user's hard drive. It is generated by a web page server, which is basically the computer that operates a web site. The information the cookie contains is set by the server and it can be used by that server whenever the user visits the site. A cookie can be thought of as an internet user's identification card, which tells a web site when the user has returned. Basically, cookies do not collect your personal information, but only information about your browser session. For more information about cookies, please visit: <http://www.aboutcookies.org>

If a cookie is placed by the website or online service you are using now, it is called a first-party cookie. If a cookie is placed by a website or online service other than the one you are using now, it is called a third-party cookie.

We use first-party cookies to personalize your experience with the Website, to understand and save your preferences for future visits, and to carry out other tasks relating to the operation or improvement of the Website.

We do not use cookies to access information on your device.

All recent versions of popular browsers allow users to control cookies. Users can set their browsers to either accept or reject all or certain cookies. Users can also set their browser to notify them each time a cookie is offered.

### 11.2 Web Beacons

A web beacon is an object embedded in a web page or email, which unobtrusively (usually invisibly) allows checking that a user has accessed the content. We reserve the right to use web beacons, for example, in emails to help us understand your activities (whether an email was opened or deleted without opening, how many times an email was forwarded, which links in the emails were clicked on and so on).

If you do not want to receive web beacons, you should disable all HTML in every message (thus rendering all messages as plain text), which prevents any web beacons from loading.

## **12. INFORMATION NOT CONTAINED IN THIS POLICY**

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

## **13. CHANGES TO OUR PRIVACY POLICY**

Any changes we make to this Policy in the future will be posted on this page. Please check back frequently to see any updates or changes to this Policy.

## **14. CONTACT**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [support@whatsonpic.com](mailto:support@whatsonpic.com)