

PRIVACY & COOKIES POLICY



BrainStarter
DOWN-TO-EARTH LAUNCHPAD

www.brainstarter.io

"This Privacy Policy sets out the rules for the processing of Users' personal data in relation to activities performed on the Platform, in accordance with the provisions of the Terms and Conditions. This Privacy Policy is an attachment to the Terms and Conditions available on the Platform www.brainstarter.io.

All terms included in this Privacy Policy should be interpreted in accordance with the provisions of the Terms and Conditions, unless their different meaning has been clearly indicated in this document."

If your place of residence is in the European Union (EU), then your personal data is processed as follows:

I. GENERAL INFORMATION

Personal data is processed in accordance with 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 regulation on data protection - hereinafter "GDPR"), the Act on the Protection of Personal Data of May 10, 2018 (Journal of Laws of 2018, item 1000) and the Act on the provision of electronic services of July 18, 2002 (Journal of Laws of 2017, item 1219, as amended).

The Personal Data Administrator is:

Brainstarter Limited (Registration No.: ICC20220622) having its registered office in Office 1204, Tiffany Tower, Al Thanyah Fifth, Plot No. 888, Dubai P.O. 487301, United Arab Emirates. All representations shall be directed to this entity only (hereinafter referred to as the "Administrator" or "Service Provider"). Contact with the Service Provider is available at e-mail: contact@brainstarter.io.

II. WHAT ARE THE PURPOSES OF PERSONAL DATA PROCESSING AND WHAT IS THE LEGAL BASIS FOR PROCESSING?

Personal data is processed for the purposes of:

1. receiving the newsletter (legal basis: Article 6(1)(a) of the GDPR),
2. performance of the Agreement or taking action at the request of the data subject prior to the conclusion of the Agreement (Article 6(1)(b) of the GDPR),
3. handling claims and complaints (Article 6(1)(b) of the GDPR),
4. conclusion and performance of the Agreement, including the performance of individual services (Article 6(1)(b) of the GDPR),
5. sending system messages or notifications to the User (Article 6(1)(f) of the GDPR),
6. developing statistics related to the User's activity on the Website (Article 6(1)(f) of the GDPR),
7. answering questions (Article 6(1)(f) of the GDPR),
8. storing documentation or archiving it for the purposes of examining, processing or settling claims (Article 6(1)(f) of the GDPR),
9. marketing, including monitoring and matching content to Users' interests, monitoring Users' activity, which includes searching for keywords, information on the Portal, as well as managing Users' activity on the Portal - to make it possible, we perform profiling, which, however does not affect the Users' rights or freedoms or otherwise affects the User (legitimate interest of the Service Provider, clearly defined in the provisions of the General Data Protection Regulation (recital 47 of the GDPR).

III. HOW DO WE OBTAIN PERSONAL DATA?

1. We collect personal data directly from Users.
2. We may collect personal data indirectly only during Registration - if the Portal User sends an invitation to a third party. In this case, the User provides the e-mail address of the person to whom the invitation is then sent. This person should confirm their willingness to register and complete their personal data.

IV. WHAT DATA DO WE PROCESS AND FOR HOW LONG?

If:

1. you are browsing the Website: IP address (for static purposes), cookies. We store data until cookies expire.
2. you contact us using the contact form: the data and IP address provided by you. We retain data for 36 months or longer if necessary to assert, process or defend against legal claims.
3. you file a claim or submit a complaint: data contained in the document. We store the data for the period required by law for the purpose of investigating, processing or defending against legal claims. The complaint is considered within 30 days.
4. you order Paid Services: data necessary to provide the Service. If it is access to content, we do not process more data than related to the payment process. The payment service is provided by the payment operator. Card data is not processed by the Service Provider. In the case of stationary training services or other services provided outside the Website, we process the data necessary to use the Service. The data is processed for the duration of the Service, and after this period for the time necessary to investigate, process or defend against legal claims - including accounting, legal and IT services.
5. you receive a newsletter: e-mail address. You can withdraw your consent and unsubscribe from the newsletter by clicking the unsubscribe option directly in each email sent. If you unsubscribe, we will only process information about when you subscribed to the newsletter and when you unsubscribed from it (in both cases your IP address will be saved). NOTE: The Newsletter is not a message system sent by the Service Provider informing about alerts or other important notifications related to the User's Service or other Services.
6. you receive system messages or notifications: username, email address. No notifications and/or system messages will be sent in the event of Account deletion. However, the data will be processed for archiving purposes for a period of up to 36 months or longer (if it is necessary for the purpose of investigating, processing or defending against legal claims).
7. we keep records or archive for the purposes of investigating, processing or settling claims: data necessary for a given process. Deletion occurs after the process is complete.
8. you use the Portal: your activity on the Portal - information resulting from monitoring activity on the Portal aimed at profiling data, including: Information in HTTP headers, which contain information about the browser or application used; Information on standard/optional events, e.g. "page view" or "application installation", further object properties and buttons pressed by visitors to the Portal; Online identifiers, including IP addresses and, if provided, identifiers associated with Facebook or device identifiers (e.g. advertising identifiers in mobile operating systems) and information on opting out / organizing advertising monitoring - are stored until the User's account is deleted.

If we write that we store data for the period required by law for the purposes of research, processing or defense against legal claims, we mean the period indicated by law as the required period.

V. WHAT NOTIFICATIONS AND SYSTEM MESSAGES DO WE SEND?

The website can send notifications (so-called web push notifications) if you agree to it from the browser level. In this case, you will receive notifications visible from your device.

The website may send notifications visible after logging in. The user can set the frequency of sending information. Messages can be sent once a day, once a week, or they can be turned off. By default, the sending of notifications is disabled and the user is asked to select the frequency settings.

The Service Provider may send system messages to the User's e-mail address. These messages are sent as needed and relate to messages related to the Service.

VI. WHO DO WE SHARE PERSONAL DATA WITH?

The recipients of the data may only be authorized employees of the Service Provider or co-workers providing services related to customer service or IT support or accounting or legal services, as well as advertising partners.

VII. OUR RIGHTS RELATED TO THE PROTECTION OF PERSONAL DATA

Each data subject has the right to access, rectify, update, transfer, delete or limit processing, the right to raise objections, the right to withdraw consent at any time (withdrawal of consent does not affect the lawfulness of the processing was made on the basis of consent before its withdrawal), the right to lodge a complaint with the supervisory body, i.e. the President of the Office for Personal Data Protection. In order to exercise your rights, please send a relevant request by e-mail to: contact@brainstarter.io. We will consider your application immediately, but not later than within 1 month of receiving the request from the User. However, if the execution of the request within the indicated period is not possible, e.g. due to the complicated nature of the request or the number of requests, we reserve the right to extend the deadline for considering the request, but not longer than 2 months. We will inform you by e-mail about the possible need to extend the deadline for processing your inquiry.

VIII. COOKIES

Cookies are sent to web browsers, then saved in the device's memory and read by the server each time you connect to the website. Cookie files do not contain any information enabling third parties to learn your personal data or contact you, e.g. by email or telephone. We also point out that saving cookies does not allow us or unauthorized persons to access your private device.

What types of cookies do we process?

1. Technical cookies

They enable the correct use of the message transmission and remember your settings after selecting this option on the website and/or allow us to create simple statistics on the use of the website. When collecting information about errors, we use cookies responsible for the login session and the selected language, including e-mail address and username.

2. Google Analytics

Google Analytics is analytical tool provided by Google that helps website and application owners understand how users use them. The tool may use a set of cookies to collect information and generate reports with website usage statistics. The collected data does not identify individual users. The main type of cookie used by Google Analytics is "_ga".

In addition to reporting website usage statistics, the data collected by Google Analytics can also help, with some of the cookies described above, to display more relevant advertisements across Google services (e.g. Google Search) and across the web.

[Learn more about Google Analytics cookies and privacy.](#)

How can I disable cookies?

You decide about the processing of cookies using your browser settings. If you do not want cookies to be processed, you can disable them (select the appropriate privacy options in your browser). You can delete cookies from your browser at any time.

Disabling cookies in your web browser may affect the way the content of the Website is displayed.

IX. WHAT PERSONAL DATA IS TRANSFERRED OUTSIDE THE EUROPEAN ECONOMIC AREA?

Mailchimp cookies are sent to the United States of America (USA) and include: e-mail address, IP address, date and time of each contact related to each opening and clicking on the newsletter email campaign. Both the Service Provider and The Rocket Science Group LLC have access to this data.

X. HOW CAN YOU CONTACT US?

All inquiries regarding the method of data processing should be directed to the following e-mail address: contact@brainstarter.io.

If your place of residence is outside the European Union (EU), then your personal data is processed as follows:

I. DATA PROCESSING

By transferring data from the User to the Service Provider, in the scope of using the Website, the User agrees to place his personal data in the Service Provider's database and to process them in order to provide the Service on the basis of these Terms and Conditions.

The Personal Data Administrator is:

Brainstarter Limited (Registration No.: ICC20220622) having its registered office in Office 1204, Tiffany Tower, Al Thanyah Fifth, Plot No. 888, Dubai P.O. 487301, United Arab Emirates. All representations shall be directed to this entity only (hereinafter referred to as the "Administrator" or "Service Provider"). Contact with the Service Provider is available at e-mail: contact@brainstarter.io.

The Administrator processes personal data in accordance with the requirements of applicable law, including in particular the Privacy Protection Laws in the United Arab Emirates regarding the security of personal data. The User is responsible for providing false personal data. By accepting the Privacy Policy, the User agrees to the terms of collecting, processing and securing personal data related to the use of the Website.

II. RESPECT FOR PRIVACY

The Service Provider makes every effort to ensure that personal data is processed with the greatest respect for the privacy of the data provider and with the utmost care for the security of personal data processed, and in particular ensures that all legal measures are taken to protect the collected personal data.

III. MEASURES APPLIED

The Service Provider declares that he uses technical and organizational measures to ensure protection of the processed personal data appropriate to the threats and categories of data protected, and in particular protects the data against unauthorized disclosure, processing in violation of the law and its loss, damage or destruction.

IV. SCOPE AND PURPOSE OF PROCESSING

The Service Provider processes the User's personal data for the purpose of:

1. establishing, changing, performing or terminating the contractual relationship between the Service Provider and the User;
2. fulfillment of the Administrator's legal obligations;
3. marketing and advertising of the Services, as well as sending commercial information;
4. the use of ICT end devices and automatic triggering systems for marketing purposes.

V. DATA PROFILING

The processing of personal data includes profiling of Users in terms of their behavior, interests, payment credibility and shopping preferences. On the basis of profiling, Users are provided with specific content that may potentially be of interest to them.

VI. DATA SHARING

In order to perform the Agreement, the Administrator may share the collected personal data with entities, including: employees, associates, a courier company, Internet payment system operators, entities providing operational, legal, accounting and IT services to the Service Provider, as well as entities personally or financially related to the Service Provider. In such cases, the amount of information disclosed is limited to the necessary minimum.

VII. TRAFFIC ANALYSIS IN THE SERVICE

The Service Provider declares that he may use tools for analyzing traffic on the Website, such as Google Analytics and other similar ones. In particular, the Service Provider has the right to collect information about the User's activity and behavior, such as visiting the Website and using the Services. The Service Provider uses this data to research

the market and traffic on the Website, as well as to create statistics, in particular to assess the interest in the posted content, as well as to improve the Website and fulfill obligations in the field of anti-money laundering and counter-terrorist financing. The collected data will be processed anonymously and used only for statistical purposes or to ensure proper use of the Website.

VIII. TERMINATION OF THE USE OF THE SERVICE

After the termination of the Agreement by the User, the Service Provider does not process the User's personal data, except for:

1. statements made by the User on the basis of this Policy and the Terms and Conditions;
2. advertising, market and behavior research to improve the quality of services provided;
3. explanation of circumstances inconsistent with this Policy and Terms and Conditions or the right to use the Website or Services provided on the Website;
4. authorization to process the data on the basis of an agreement or separate legal provisions.

IX. USER RIGHTS

The Service Provider ensures that the applied conditions for the processing of personal data are consistent with the Users' rights resulting from applicable law, in particular the right to access, correct, update, delete, limit processing, transfer own data, raise objections, withdraw consent, and submit a complaint to the supervisory authority. Inquiries regarding the Privacy Policy and personal data are considered in accordance with the complaint procedure specified in the Terms and Conditions.

X. SCOPE OF DATA

The Service Provider processes or may process the User's personal data, respectively in the scope of data provided by the User, including in particular identification and contact details.

XI. BROWSING THE WEBSITE

Browsing the Website does not require providing personal data by the User, unless access to specific content or services depends on its provision.

XII. RULES OF DATA PROCESSING

The Service Provider adheres to the following rules for the processing of personal data:

1. saving the collected personal data only on such storage media that are protected against access by third parties;
2. reporting personal data files or designating persons performing the required duties for this purpose;
3. supervision over the security of personal data throughout the period of its possession in order to ensure, in particular, protection against unauthorized access, damage, destruction or loss;
4. sharing personal data with competent authorities on the basis of applicable law;
5. maintaining the confidentiality of personal data.

Personal data processed by the Service Provider is not made available in a form that allows any identification of the User, unless the User has consented to it or the obligation to disclose such information results from applicable law.

XIII. COOKIES

Types of Cookies

The Service Provider may use the following types of cookies on the Website and in the App:

1. temporary, which are deleted after leaving the Website or turning off the web browser;
2. permanent, which are stored on the User's end device for an indefinite period or until they are manually deleted by the User;
3. statistical data that tracks traffic on the Website;
4. functional, enabling personalization of the website in relation to the User;

5. advertisements that enable the delivery of content to the User tailored to their personal preferences;
6. mandatory and security, which relate to the principles of security on the Website and the principles of authentication.

Purposes of use

The Service Provider uses cookies for the following purposes:

1. optimizing and increasing the efficiency and quality of the Services;
2. correct configuration of the functions available on the Website and in the App;
3. personalization of the displayed content and matching of advertisements to people visiting the Website and the App;
4. after logging in to maintain the User's session on the Website and in the App, thanks to which the User does not have to re-enter the login and password on each subpage;
5. maintaining the security and reliability of the Website and the App;
6. collecting and using general and publicly available statistical data using analytical tools.

Analysis

To ensure the highest quality, cookies are analyzed to determine which subpages are visited most often, which browsers are used by visitors and whether the structure of the Website is error-free.

Cooperation with entities

Cookies stored on the User's end device may be used by other entities that affect the quality of the Services provided. The User may at any time change their own cookie settings, specifying the conditions for storing and granting access to cookies on the User's device. The User has the option to change the settings referred to above using the web browser settings or by configuring the Services. These settings can be changed in such a way as to block the automatic activity of cookies in the web browser or inform the User about the placement of a cookie file on the User's device.

User rights

Users may at any time delete cookies using the settings available in the web browser they use. Limiting or blocking cookies by the web browser used will not prevent Users from using the Website, however, it may cause difficulties or malfunctions in the operation of the Website, for which the Service Provider is not responsible. It is recommended to use software that enables cookies.