

# Privacy policy

STAPS PLATFORM, hereinafter the Company, thanks you for your interest in the Company's Products and Services. Protecting your personal information is very important to us, so we take special care protecting the data collected and processed while using the Website.

An access to use the Website and / or services means the User's unconditional consent to the provisions of this Privacy Policy. STAPS PLATFORM, "we ", " Our" of information received from users hereinafter referred to as User, " you ", " your " on <https://www.staps.io> hereinafter the Website, services of the company or any other functions, technologies offered by the Company on the Website or through any mobile applications of the Company and any other online services offered by the Company hereinafter Services, which link to this Privacy Policy or have references to it. By using the Website and / or any Services, you agree with this Privacy Policy. If you do not agree with this Privacy Policy, please do not use our website. Your continued use of the Website after the publication of changes to this Policy will be considered as acceptance of these changes. The Company ensures the security of personal information received from Users of the Website. This Privacy Policy is designed to indicate the list of data that may be requested from Users of the Website, as well as how the company and others treat such data. This Privacy Policy also specifies the purposes for which the personal information of Users may be requested or disclosed. Separate agreements might provide other purposes in which the personal information of Users might be requested or disclosed. This Privacy Policy also identifies the main precautions that must be taken by Users to ensure that their personal information remains confidential. Our Website may contain links to other websites that are not supported by the company's website. This Privacy Policy applies only to information collected through our Websites and / or Services, and does not apply to third-party websites and services that you can access through these links. When you visit these third-party websites, you should read their privacy policy, which will apply to your use of these websites.

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Information we may collect:

1. Personal identification information provided to us:

1.1. We can collect personal identification information from users in various ways, including but not limited to when users visit our Website, register on the Website, fill out the form, regarding other activities, services, functions or resources available on our Website.

1.2. We collect and process personal information that the User independently provides when creating an account, registering, and while using the Website Services (name, gender, e-mail address, phone number, etc.). As well as automatically transmitted data in the process of using the Services of the Website, including but not limited to: IP address, information about the mobile device used to access the Website. In the process of using the services of the site, you can provide other information.

1.3. We collect personal identification information from users only if they passively or voluntarily submit this information to us. Users can always refuse to provide personal identification information, except when it may prevent them from participating in certain activities related to the Website. Thus, in some cases, we will not be able to provide services

to you unless you provide us with personal identification information in accordance with the requirements of laws on combating money laundering and other legal acts.

1.4. When using User's information, we are guided by this Privacy Policy.

2. The information we collect automatically:

2.1. We collect non-personal information about Users when they interact with the Company's Website or Services. This may include, but is not limited to: • Registration information - information about the User's use of online services, including the type of browser used, access time, viewed pages, IP address and page that the user used before switching to the company's online services; • Information about the mobile device. The Company collects data on Users' mobile devices, such as a mobile device model, operating system version, unique device identifiers, as well as mobile network data and mobile phone number. In addition, the device ID and mobile phone number can be linked to the Account; • Location information. Services of the company supporting the geographic location function of the User allow receiving information about the location of the User's actual location, including GPS data sent by the mobile device;

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• Information collected from cookies - the Company or our third-party partners may use cookies (as well as web beacons or other technologies) to collect and store information about the visit or We store the collected information for as long as it is necessary to provide Services to you. We generally store information on your transactions for five years. The information associated with your account will be kept until your account is deleted, unless we no longer need the data to provide Services. Disclosing Your Information The Company is entitled to provide User information to its affiliates, as well as to partners and other companies associated with us for the purposes specified above, only with prior notice to the User. At the same time, affiliated persons, current and future partners, as well as related companies are obliged to adhere to this Privacy Policy. The company has the right to share information about the User as follows: • With current and future partners, affiliates, subsidiaries and other companies under common control and ownership in the course of delivering our Services to you; • With affiliates, consultants, and other service providers when we believe it will enhance the Services and products we can provide to you, or for legal and routine business reasons, so long as those parties agree to keep this information confidential; Information is not provided to companies and individuals not associated with the company, except for the cases listed below: • The user has given his consent. To provide the Company with User information, companies and individuals not connected with the Company, including other Users, are requested additional User consent. The user Can at any time revoke this consent. • On demand of the current legislation. User's information is provided in case the receipt, use and disclosure of such information is necessary for the purpose: • compliance with applicable laws, judicial decisions or compliance with legal requirements of state bodies; • identify, prevent fraud, as well as eliminate technical failures or security problems; • protecting the rights, property or safety of the Company, Users of the Website Services within the limits permitted by applicable law. The company may provide generalized impersonal data of Users of the Website Services to partners For example, for the purpose of conducting statistical and other research. When transmitting User's information abroad, the Company ensures compliance with the current legislation and this Policy with respect to User information by concluding agreements in which it will be ensured that the recipients of information adhere to the appropriate level of protection.

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**Security and Storage of Information** We take all possible measures to ensure the security and protection of User's information from unauthorized attempts to access, modify, disclose or destroy, as well as other types of improper use. In particular, the ways of collecting, storing and processing data, including physical security measures, are constantly being improved to counter unauthorized access to the Website systems and Company Services for the purpose of stealing property, phishing and other types of fraud. Also, employees 'and agents' accesses to the User's information is limited, provided for strict confidential obligations, for violation of which strict penalties are provided. The User must store the account information, such as login and password and other identification data, in secret from third parties. The User agrees to immediately report any suspected unauthorized use of his account. We adopt appropriate data collection, storage and processing practices and security measures to protect from unauthorised access, alteration, disclosure or destruction of your personal information, user credentials, transaction information, and data stored on our Website. As soon as we receive your private information, we implement reasonable security measures and procedures to avoid unauthorised access from any third party. However, transmission of such data over the Internet using personal computers or mobile devices is not completely safe and, therefore, we cannot guarantee absolute security of all information submitted to our platform. Any transmission of such information and documents is at your own risk. The information that we collect from you may be transferred to and stored at a destination outside the Special economic zone, in particular where counterparties to any of the service offered through our Website are based outside of the Special economic zone. Your information may also be processed by staff operating outside of the Special economic zone who works for us or for one of our suppliers. By submitting information to us, you agree to such transfer, storing or processing.

**Children Under the Age of 16** Company's Services are not intended or directed at individuals under the age of 16. Individuals under the age of 16 may not create an account or otherwise access or use the Services.

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**The ability to control the transmission of information** The choices the Company may give the Useres in regard to the sharing of information with our partners, affiliates and third parties, will be described in the privacy policies or notices the Useres receive in connection with the products or services you obtain from us. The Company may provide the Useres with tools and settings that allow you to access, correct, delete and modify information associated with their account. The User may also remove cookies stored from his/her computer or mobile device. However, if you do block cookies, you may not be able to use certain features and functions of our web Websites. **Changes to the Privacy Policy** The Company may ammend this Policy at any time. The new version of the Privacy Policy comes into effect from the moment of its placement, unless indicated otherwise. Users of the Website and/or Services must regularly access this Privacy Policy in order to familiarize themselves with the most current version. **Contact us** We provide Users with access to their personal identification information. Users may update or delete such information at any time on their own discretion. We will not keep outdated or deleted information, unless we have to do so for legitimate business purposes or in accordance with legislative or regulatory requirements.

If any of your information that we hold is incorrect, you can change it by contacting us at [support@staps.io](mailto:support@staps.io). If you have a concern about the way we handle your personal

information, you have a right to lodge a complaint or turn to court. For more information on the process please visit the Website of the Commissioner for Private Information and Personal Data (The Office of the Privacy Commissioner for Personal Data). at <https://www.pcpd.org.hk>. With any other questions or concerns about the Privacy Policy, we recommend that you contact us at [support@staps.io](mailto:support@staps.io).

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**Cookie policy** A cookie is a very small text document or piece of code, which often includes an anonymous unique identifier. When you visit a website or use a mobile application, a computer asks your computer or mobile device for permission to store this file (or similar technologies such as web beacons) on your computer or mobile device and access information from it. Information gathered through cookies or similar technologies may include the date and time of visits and how you are using the website. Cookies are used by us as part of this Website. Our Website also uses third party cookies for analytics. By continuing to use our Website you are deemed to consent to our use of the cookies described in this Cookie Policy. If you do not consent to us using cookies then please read the next section.

**What Happens When You Block Cookies** In order to use some parts of our Website, your web browser will need to accept cookies. If you choose to withhold consent, or subsequently block cookies, some aspects of the Website may not work properly and you may not be able to access all or part of the Website.

**What We do With Cookies** The Company uses session cookies to allow the Website to uniquely identify the User's browsing session on the Website, which allows the Company to coordinate this information with data from the Website server. Such cookies are stored temporarily during a browsing session and are deleted from the User's device when the browser is closed. The Company also uses persistent cookies that may be saved on User's computer for a fixed period and are not deleted when the browser is closed where we need to know who the User is for more than one browsing session. For example, this type of cookie is used to store your preferences, so that they are remembered for the next visit, or to keep you logged in if you navigate away. The Company may also use cookies where they are essential for the operation of the Website, for example to remember that you are signed in to the Website during your session. The Company uses "analytics" cookies. These, along with other information, allow us to calculate the aggregate number of people using the Website and which features of the Website are most popular.

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This information is used to improve the Website. We do not generally store any personal data that may be provided to us in a cookie. We use the following types of cookies or similar technologies:

1. Google Analytics (Third Party Cookie) - These cookies enable us to store information such as the time you visit our Website, whether you have visited before and the Website that you visited prior to visiting our Website. For more information about Google Analytics please see: <http://www.google.com/intl/en/analytics/privacyoverview.html>.
2. Twitter, Slack, Telegram and LinkedIn buttons - These cookies enable users to like or share items in social pages. For more information see respective page privacy policy.
3. Track URL - This cookie informs us which webpage you visited immediately before coming to our Website. It does not collect any personal data or send personal data any third party.