



Privacy and Terms

Last updated: 19/09/2019

Please read carefully this Privacy Policy (hereinafter – the “Policy”) prior to using rgray.io Website (hereinafter – the “Website”).

If you do not agree with this Policy, You may not access or use the Website or any other services provided by the RGray. All information and services provided on the Website are provided on a strictly “as is” basis without any warranty whatsoever.

1. Privacy Policy Status and Acceptance

1.1. This Policy sets forth the general rules of User’s Personal Data collection, processing, distribution, use and keeping by the Company during the Website use and/or directly on our request.

1.2. Each User must carefully read and comply with this Policy.

It is understood and presumed per se that by the fact of the Website use or by providing us with the Personal Data directly on Our request, the respective User fully read, understood and accepted this Policy. If any User does not agree with this Policy in general or any part of it, such User must not access and use the Website.

1.3. The Company reserves the right to modify or amend this Policy at its sole discretion. Any revisions to this Privacy Policy will be posted on the homepage of the Website. If We make changes, We will notify You by revising the date at the top of this Policy. In addition, if the revised version includes any substantial changes to the manner in which Your personal information will be processed, We will provide you with prior notice by posting notification of the change on the Privacy Policy area of Our Website. We strongly recommend you to periodically visit the Website to review any changes that may be made to this Privacy Policy to stay informed about Our information practices and Your privacy rights and choices. Your continued usage of the Website shall mean Your acceptance of those amendments.

2. Terms and Definitions

2.1. Applicable Law - laws of Ukraine applicable under this Policy to any and all relations between a User and Company.

2.2. RGray (also referred to as “the Company”, “We”, “Our”, “Us”) – a company, incorporated under the laws of Ukraine that owns the Website.

2.3. Privacy Policy (also referred to as “Policy”) – this Privacy Policy posted on the homepage of our Website which may be revised or updated from time to time as stated in subsection 1.3 of this Privacy Policy.

2.4. Personal Data (also referred to as “Personal Information”) - any information relating to an identified or identifiable natural person (“data subject”).

2.5. User (also referred to as ‘You’, ‘Your’) – any person, who uses the Website.

2.6. Website – the website maintained and owned by the Company at RGray

3. Personal Data Collection

3.1. We collect Personal Data from running the Website and use Personal Data, provided to Us by You. We may collect such data:

- e-mail address;
- full name;
- job title
- industry
- anything that is written in the “Your Message” form or any other form on the website used to send a contact message to RGray

3.2. When You visit the Website, We also automatically collect the data (which may include Personal Data) sent to Us by Your computer, mobile phone, or other access devices for the traffic analysis and statistic purposes. This data may include:

- your IP address;
- device information including, but not limited to, identifier, name, and type of operating system;
- mobile network information;
- standard web log information, such as Your browser type, and the pages You accessed on Our Website, access times, website navigation paths.

3.3. When You access the Website, We (or Google Analytics or similar service provider on our behalf) may place small data files called cookies on Your computer or other devices. We use these technologies to recognize You as our User, customize Our Website, understand usage and determine the effectiveness of email marketing campaigns, measure promotional effectiveness and collect information about Your computer (as described in clause 5.5 hereof) or other access device to mitigate risk, help prevent fraud, and promote trust and safety. You may control the use of cookies within Your internet browsers’ settings. If you reject or delete certain cookies, be aware that the performance of the related features and functions of our Websites and services may be impaired. Web beacons (or pixel tags) are electronic images that may be used in our Website or emails to help deliver cookies, count website visits, understand usage and determine the effectiveness of email marketing campaigns.

4. Purpose of Personal Data Use

4.1. We collect from the Users only the Personal Data that we need for their proper use of the Website. In particular, we use Your Personal Data to:

- administer Our Website and provide services;
- facilitate the provision of Our Services;
- personalize Our Website for You;
- send You technical notices and support and administrative messages;
- communicate with You about products, services, promotions, events and other news and information we think will be of interest to You;
- monitor and analyse trends, usage and activities in connection with Our Website and services; and
- provide third parties with statistical information about Our Users (but those third parties will not be able to identify any individual User from that information).

5. User`s Rights and Terms and Conditions for using this website

5.1. You have a right to access to Your Personal Data, withdraw your consent for data processing, obtain the information whether or not your personal data is being processed and to require the correction, updating or deletion of incorrect or/and inaccurate data by contacting us at business@RGray.io. We shall delete Your respective Personal Data from any sources within 24 hours from the moment We receive such request from You.

5.2. You have the right to receive notices of processing activities from the Company.

5.3. You have the right to transfer data in a machine-readable format.

5.4. You have the right to lodge a complaint with the local supervisory authority, authorized to review such complaints.

5.5. You are entitled with and may exercise any of the rights and freedoms guaranteed by the General Data Protection Regulation (the GRPR) with regard to the processing of personal data if you fall under its` material and territorial scope as defined in the GDPR.

5.6. You can exercise your data rights by contacting us at the e-mail address specified in the paragraph 9 (Contact details) of the Privacy Policy.

6. Sharing Data with Third Parties

6.1. We may use third party service providers, which we entrust storing data, its collection, processing and analysis. This is made in order to enable You to get the best services possible and to make our cooperation the most effective and with the best benefit for You. These third parties may only use information about you to perform services on our behalf. They are not allowed to use it for their own purposes. We ensure the data will be processed according to the Applicable Law.

6.2. We reserve our right to share Your Personal Data with the following parties and with regard to the following cases:

- companies that We plan to merge with or be acquired by (all or a portion of our business);
- companies in connection with, or during negotiations of, any sale of company assets or any financing by another company;
- service providers that execute any work for us (such as hosting providers, identity verification, support, payment, and email service providers);
- in response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation or legal process;
- if we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property and safety of our Company or others;
- between and among the Company and its current and future corporate parents, affiliates, subsidiaries and other companies under common control and ownership;
- when we believe, in our sole discretion, that the disclosure of personal information is necessary to report suspected illegal activity or to investigate violations.

6.3. We will not provide Your Personal Data to any other Website users or third parties other than described in clause 6.3 herein without Your consent or direction.

6.4. We will not sell or rent Your Personal Data and/or customer lists to third parties without your explicit consent.

7. Third-Party Services

7.1. Our services may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates (including, but not limited to, websites on which the Website is advertised). If You follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own terms of use privacy policies and that We do not accept any responsibility or liability for these policies or for any Personal Data that may be collected through these websites or services, such as contact and location data. Please check these policies before You submit any personal data to these websites or use these services.

8. Data Storage and Retention

8.1. In accordance with Applicable Law and as needed to provide services to Our Users, We may store and retain Your Personal Data provided it's integrity and the appropriate approach to it. This requirement is conditioned by the need of complying with legal obligations and resolving possible disputes. We may retain Your Personal Data for as long as Your account is active. Moreover, Your Personal Data may be held beyond the above mentioned period until it is indispensable for Us to have relevant information to respond to any issues that may arise later.

9. Security

9.1. We use relevant electronic and procedural safeguards to protect the privacy of the information You provide to Us from loss, misuse, disclosure, alteration and destruction. Please note that transmission of data or information (including communications by e-mail) over the Internet or other publicly accessible networks is not one hundred percent secure. Please note that We are not liable for the security of any data You are transmitting over the Internet, or third-party content.

9.2. We store and process Your Personal Data on Our servers in various jurisdictions, where our facilities are located. By submitting Your Personal Data, You agree to this transfer, storing, or processing. We will take all steps reasonably necessary to ensure that Your Personal Data is treated securely and in accordance with this Policy. We protect Your Personal Data under internationally acknowledged standards, using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration. Some of the safeguards We use are firewalls and data encryption, physical access controls to our data centres, and information access authorization controls. We also authorize access to Personal Data only for those employees or contractors who require it to fulfil their job or service responsibilities. All of our physical, electronic, and procedural safeguards are designed to comply with applicable laws and regulations.

9.3. Third parties, whom we entrust the data, may be located in other countries where the laws on processing of Personal Data may be less stringent than in Your country.

From time to time, the Personal Data may be also stored in other locations, and in such cases, We will ensure that the Personal Data will be stored and processed with the reasonable level of care and security.

10. Refund Policy

10.1. The basis and conditions of eligibility for a refund are set forth in each individual binding contract signed with RGray and involving a direct bank-to-bank money transfer.

11. Notice of Copyright

PLEASE READ THIS NOTICE CAREFULLY

11.1. By viewing or otherwise using this Website, you agree to the terms and conditions in this Notice. This Notice may be changed without further notice. This Notice applies exclusively to your access to and use of this Website does not alter in any way the terms or conditions of any other agreement you may have with the Lake County Regional Office of Education.

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12. **Blog Comment Policy**

12.1. With the aim to make our comments to be as useful as possible to all of our readers, while we keep 99% of comments, we will remove these:

Harassing comments: While conversation and the sharing of different ideas is encouraged, all comments need to be respectful towards our contributors and those leaving comments.

Anonymous comments: We only accept comments from people who identify themselves.

Promotional comments: If a comment is solely promotional in nature, we will remove it from the site.

12.2. We reserve the right to remove any comments from the site; please leave comments that are respectful and useful.

13. **Cookie Policy for RGray**

This is the Cookie Policy for RGray, accessible from rgray.io

What Are Cookies

As is common practice with almost all professional websites, this site uses cookies, which are tiny files that are downloaded to your computer, to improve your experience. This page describes what information they gather, how we use it and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored however this may downgrade or 'break' certain elements of the sites functionality.

How We Use Cookies

We use cookies for a variety of reasons detailed below. Unfortunately in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this site. It is recommended that you leave on all cookies if you are not sure whether you need them or not in case they are used to provide a service that you use.

Disabling Cookies

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies may affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in disabling certain functionality and features of this site. Therefore it is recommended that you do not disable cookies.

The Cookies We Set

- Email newsletters related cookies

This site offers newsletter or email subscription services and cookies may be used to remember if you are already registered and whether to show certain notifications which might only be valid to subscribed/unsubscribed users.

- Forms related cookies

When you submit data through a form such as those found on contact pages or any other website page, cookies may be set to remember your user details for future correspondence.

- Site preferences cookies

In order to provide you with a great experience on this site we provide the functionality to set your preferences for how this site runs when you use it. In order to remember your preferences we need to set cookies so that this information can be called whenever you interact with a page is affected by your preferences.

Third Party Cookies

In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.

- This site uses Google Analytics which is one of the most widespread and trusted analytics solutions on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content.

For more information on Google Analytics cookies, see the official Google Analytics page.

- Third party analytics are used to track and measure usage of this site so that we can continue to produce engaging content. These cookies may track things such as how long you spend on the site or pages you visit which helps us to understand how we can improve the site for you.
- From time to time we test new features and make subtle changes to the way that the site is delivered. When we are still testing new features these cookies may be used to ensure that you receive a consistent experience whilst on the site whilst ensuring we understand which optimisations our users appreciate the most.

- As we sell products it's important for us to understand statistics about how many of the visitors to our site actually make a purchase and as such this is the kind of data that these cookies will track. This is important to you as it means that we can accurately make business predictions that allow us to monitor our advertising and product costs to ensure the best possible price.
- We use adverts to offset the costs of running this site and provide funding for further development. The behavioural advertising cookies used by this site are designed to ensure that we provide you with the most relevant adverts where possible by anonymously tracking your interests and presenting similar things that may be of interest.
- We also use social media buttons and/or plugins on this site that allow you to connect with your social network in various ways. For these to work the following social media sites including; {List the social networks whose features you have integrated with your site?:12}, will set cookies through our site which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

14. Children's Online Privacy Protection Act (COPPA)

Reviewing, Updating, or Deleting Your (or Your Child's) Information: As previously mentioned, except as otherwise noted in this MPP we do not collect the personal information of our individual users. However, if you believe that our website may have unintentionally collected your and/or your child's personal information, you may contact us using the details below [direct link]. We will be happy to honor your request.

If you are a resident of the European Economic Area, and if we do have any of your personal information or your child's (together, personal information), then the following data protection rights apply:

- If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us using the contact details provided
- In addition, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details provided.
- You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided.
- Similarly, if we have collected and process your personal information with your consent, then you can withdraw your consent at any time.

Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

You have the following rights in relation to your personal information: (i) to access, correct, update or request deletion of it; (ii) to object to processing of your personal information; (iii) to ask us to restrict processing of it; (iv) to request portability of it; and (v) to opt-out of marketing communications. You can exercise these rights by contacting us using the contact details provided below. You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

We will respond to requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

15. Disclaimer for RGray.io

If you require any more information or have any questions about our site's disclaimer, please feel free to contact us by email at support@RGray.io or +380 (63) 584 36 93;

Disclaimers for Company Name

All the information on this website is published in good faith and for general information purpose only. Website Name does not make any warranties about the completeness, reliability and accuracy of this information. Any action you take upon the information you find on this website (rgray.io), is strictly at your own risk. Neither RGray, nor any of the people related to the project will not be liable for any losses and/or damages in connection with the use of our website.

From our website, you can visit other websites by following hyperlinks to such external sites. While we strive to provide only quality links to useful and ethical websites, we have no control over the content and nature of these sites. These links to other websites do not imply a recommendation for all the content found on these sites. Site owners and content may change without notice and may occur before we have the opportunity to remove a link which may have gone 'bad'.

Please be also aware that when you leave our website, other sites may have different privacy policies and terms which are beyond our control. Please be sure to check the Privacy Policies of these sites as well as their "Terms of Service" before engaging in any business or uploading any information.

Consent

By using our website, you hereby consent to our disclaimer and agree to its terms.

Update

Should we update, amend or make any changes to this document, those changes will be prominently posted here.

16. **Contact Details**

16.1. If you have any questions regarding this Privacy Policy, please contact us at support@RGray.io or +380 (63) 584 36 93;

16.2. Our registered office is located at: 31 Evgeniy Konovalets st, Kyiv, 01133, Ukraine