

# PRIVACY POLICY

## **GENERAL PROVISIONS**

In order to operate Click2Sell services and to reduce the risk of fraud, Click2Sell, UAB (hereinafter may be also referred to as "Click2Sell", "we", "our", "us") must ask you to provide us with information about yourself, including your financial and other personal information. This Privacy Policy describes how we collect and use the information we receive, when you visit our website without purchasing any product, when you register with Click2Sell, and when you use our services for selling or purchasing products. Click2Sell respects your privacy and will make all reasonable efforts to ensure the personal data and other information security and confidentiality on this website and usage only in accordance with the terms of this Privacy Policy.

By visiting this website and (or) using the information or services contained here you acknowledge and agree that you are familiar with the privacy provisions and understand them. By accepting the Privacy Policy on registration, you expressly consent to our use and disclosure of your personal information and direct us to do so in the manner described in this Privacy Policy.

A special note about minors. Minors (under the age of 18) are not eligible to use our services and we ask that minors do not submit any personal information to us or use our services.

If you disagree with the terms of this Privacy Policy, please do not register for or use Click2Sell services.

## **CHANGES AND UPDATES OF PRIVACY POLICY**

We may amend or update this Privacy Policy at any time by posting the amended terms on our website. The revised and amended version will be effective at the time we post it. If you continue to use our services after the Privacy Policy has been revised and amended, you will be considered as having expressly consented to all amendments to the Privacy Policy. If you disagree with the terms of this Privacy Policy or its updates, you may close your account at any time.

Please check Click2Sell website at any time for the most current version of our Privacy Policy.

## **INFORMATION WE COLLECT**

Some of the data contained on this website, which we receive directly from you and (or) public data files, can be considered as personal data, and this data shall be processed in accordance with the laws of the Republic of Lithuania and other legal requirements and this Privacy Policy.

To open a Click2Sell account or use the Click2Sell services, you must provide your name (company name and code), address, phone number, and email address. In order to purchase or sell products through the Click2Sell services, you must provide credit card, debit card or bank account information. We may also request your identity code. This required information is necessary for us to process transactions, protect you against credit card fraud and current account fraud and contact you should the need arise in administering your account or Click2Sell services.

We may collect and store the following personal information:

1. Information you voluntarily give us. We receive and store any information you enter on our website or give us in any other way, such as email address, physical contact information, sometimes financial information, such as credit card or bank account details (depending on the service used), transactional information based on your activities on our website. We use this information in order to provide our services to you, process payments for the use of the Service and invoice you. Your credit card data is securely transmitted to a selected third party (payment gateway and/or acquiring bank) for the sole purpose of processing such payments.  
If we cannot verify the information that you provide, we may ask you to send us additional information by email (such as your driving licence, credit card statement and/or a recent utility bill, or other information linking you to the applicable address), or to answer additional questions online to help verify your information.  
We also store customer service correspondence and other correspondence from you to Click2Sell. We retain this information in order to keep records of our relationship, to measure and improve our customer service, and to investigate potential fraud and violations of our Terms and Conditions.
2. Automatically collected information. When you arrive at or leave the Click2Sell website, we automatically receive the web address of the site that you came from or are going to. We also collect information on which pages of our website you visit, IP addresses, the type of browser you use, the geographic location of your computer, the times you access our website, ad data and standard web log information. We use this information in order to understand how visitors use our website and to improve our services.
3. Usage of "Cookies". On our website we may use "cookies". "Cookies" are small files of data that reside on your computer and allow us to recognise you as a Click2Sell user if you return to our website using the same computer and browser. Most web browsers accept "cookies", but you can change your browser settings and disable "cookies". In this case, some features of our website may not work or operate correctly.  
By using "cookies" we collect and store the above-mentioned information about the visitors of the vendor's websites whether they access them directly or via the affiliate links. We use this data on an anonymous basis and we do not correlate this information with personal information of any user.  
We may also collect information about your computer or other access device to mitigate risk and for fraud prevention purposes.

4. Information about you from third parties.

We might receive information about you from third parties and add it to our account information. In order to protect all our users against potential fraud, we verify the information you provide with the payment and credit or debit card processors and/or fraud agencies. In the course of such verification, we receive personally identifiable information about you from such services. We use card authorisation and fraud screening services to verify that their information matches the information you supplied to Click2Sell.

## **USE AND DISCLOSURE OF INFORMATION**

Your personal information is collected and processed by Click2sell for the purposes which are strictly connected to the use of our website, our services and to the sale or purchase of products on the vendors' websites. It may also be used for interrelated operations, within the limits of above mentioned purposes. Your personal information shall be stored in a way which allows Click2Sell to identify you only for the period strictly necessary for the purposes for which the information was collected and subsequently processed.

You agree that we may use your personal information to:

- contact you about our programs, products, services;
- provide the services and customer support you requested;
- resolve disputes, collect fees, and troubleshoot problems;
- customize, measure, and improve our services and our website content and layout;
- tell you about targeted marketing, service updates, and promotional offers based on your communication preferences;
- compare information for accuracy, and verify it with third parties;
- prevent potentially prohibited or illegal activities.

### **Disclosure to third parties**

Click2Sell will not sell or rent any of your personal information to third parties for their direct marketing purposes without your explicit consent, and will only disclose this information in the limited circumstances and for the purposes described in this Privacy Policy (for example, if the applicable law requires to do so or if it is necessary for service purposes). Specifically, you consent to and direct Click2Sell to do any and all of the following:

1. Disclose personal information to respond to legal requirements: it may be disclosed for law enforcement or other governmental officials in response to a verified request relating to a criminal investigation or alleged illegal activity (for example, it may be disclosed in connection with an investigation of fraud, intellectual property infringement, piracy or other illegal activity).
2. Disclose information to your agent or legal representative (such as the holder of a power of attorney that you grant, or a guardian appointed for you).

3. We may employ other companies and individuals to perform service or functions on our behalf. The purpose of this disclosure is to allow us to provide our services to you. Our employees, agents, contractors or other third parties that have access to your personal information are limited by law or by contract from using the information for secondary purposes beyond the purposes for which the information was shared and (or) the purposes of performing their functions.
4. It is possible that in the future Click2Sell could merge with, or be acquired by, another company. If such an acquisition occurs, you consent to the successor company having access to the information maintained by Click2Sell, including user account information, and such successor company would continue to be bound by this Privacy Policy unless and until it is amended.

We guarantee that:

- Your personal information will not be transferred to the third parties that do not ensure an adequate level of protection of your personal data.
- We will not share your personal information in ways unrelated to those described above without your explicit consent.

By accepting this Privacy Policy, you expressly agree and consent that each time you purchase or sell products using Click2Sell services, Click2Sell may transfer the aforementioned relevant data to the other party of transaction (vendor or buyer), who may be located outside the European Union, in order to process, execute or otherwise deal and provide information about the purchase or payment.

## **CONFIDENTIALITY AND SECURITY OF INFORMATION PROVIDED**

Our goal is to ensure the maximum security degree of all information, received from you or other public files. In order to protect such information from unauthorized access, use, copying or disclosure, we use a variety of administrative, technical and physical security tools. The personal information we collect is stored in limited access servers. We have also adopted security measures to protect personal information against accidental or illegal destruction, accidental loss, alteration, unauthorized disclosure or access, and against all other illegal forms of data processing by using firewalls and data encryption.

However, there's no guarantee, that any data transmission over the Internet can be guaranteed to be completely secure. Accordingly, we cannot ensure or warrant the security of any information that you transmit to us, so we do not promise, and you should not expect, that your personal information or private communications will always remain private. It is advisable that your computer is provided with software devices for the protection of network data transmission/receipt and that your Internet service provider has taken appropriate measures for the security of network data transmission. The security of your Click2Sell account also relies on your protection of your Click2Sell account password. You may not share your Click2Sell account password with anyone. Click2Sell representatives will never ask you for your password,

so any email or other communication requesting your password should be treated as unauthorised and suspicious.

## **YOUR RIGHT TO ACCESS PERSONAL INFORMATION AND UPDATE IT**

You are entitled to demand the access to your personal data, which we store, and information on how and why it is being processed, categories of subjects to whom your personal data may be disclosed and request to provide such data to you. You have the right to demand to correct any of your personal data free of charge.

You may do the following changes to your personal information by logging in to your account on the Click2Sell website:

1. Update your personal information if it changes or is inaccurate;
2. Delete, transform to anonymous or block your personal information (in this case we retain your personal information in order to comply with law, prevent fraud, collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations, and take other actions otherwise permitted by law).

In case you have any questions about privacy of your personal information or think it was collected or used in breach of this Privacy Policy, please do not hesitate to contact us [info@click2sell.eu](mailto:info@click2sell.eu).

## **THIRD-PARTY WEBSITES**

Some pages on the Click2Sell website include links to third party websites. These sites are governed by their own privacy statements, and Click2Sell is not responsible for their operations, including but not limited to their information practices. We recommend you review the privacy statements of these sites before providing them with personally identifiable information.

## **APPLICABLE LAW AND DISPUTE RESOLUTION**

The law of Republic of Lithuania is applicable for this Privacy Policy. All disputes because of these privacy provisions will be resolved through negotiation, or if they fail - in the courts of the Republic of Lithuania according to the registration address of Click2Sell.