

Nicgrade confidentiality policy

personal 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 such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (R.M. Law no. 133 from 08.07.2011 on the protection of personal data/EU's General Data Protection Regulation (GDPR) EU 2016/679).*

Dear Client,

Your privacy is very important to us!

We inform you that NicGrade does not collect any personal data from natural persons, as described above in the legal definition.

Respectively, the confidentiality policy is addressed to legal entities our business partners.

Confidential Information would include, for example: agreements, transactions between us, or any business, transaction or investment idea under consideration by you; the existence, nature and contents of any printed or electronic material furnished by you to be used by us, any information, materials or other communications or content we receive from you as confidential.

As a general rule, NicGrade collects data from you, our business partner and client when you visit our website or buy our IT products.

If you choose to provide us with data regarding your organization on our website, through such methods as completing a web form or sending us an email, we will use that information to help us provide you the information or service you have requested or to respond to your message. The information we may receive from you varies based on what you do when visiting our site. Generally, the information requested by NicGrade (hereinafter referred as Company) will be used to respond to your inquiry or to provide you with the Product you request.

However, the company uses the information received from you to perform the following tasks:

- Implementing the Company's contractual obligations, as well as providing information to you about our IT products and services;
- Notification of changes in the company's list of services;
- Ensuring that the content of the company's website is presented in the most efficient way for you;
- Ensuring effective management of the company's client network;
- Software management and internal operations management, including problem solving, data analysis, testing, research, statistics and studies;
- Enhance the company's digital marketing software to provide the most effective way to provide information to you and your computers;

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- Various types of online surveys to collect opinions and feedback from you;
- Preparing proposals and recommendations for you to use other software products of the Company on additional favorable terms that you may be interested in;
- We may collect and store details of how you use our services, including search queries. This information may be used to improve the relevancy of results provided by our services. Except in limited instances to ensure quality of our services over the Internet.

Automatically Collected Information

We collect and temporarily store certain information about your visit for use in site management and security purposes only. We collect and analyze this information because it helps us to better design our website to suit your needs. This information includes:

1. Cookie data while you visit one of our website <https://nicgrade.com> pages;
2. The Internet Protocol (IP) address (a unique number for each computer connected to the Internet) from which you access our website;
3. The type of browser (e.g., Firefox, Internet Explorer, Chrome) used to access our site;
4. The operating system (e.g., Windows, Mac OS, Unix) used to access our site;
5. The date and time you access our site;
6. The Universal Resource Locators (URLs), or addresses, of the pages you visit;
7. Your username, email and other personal data in case you fill one of our web forms or if it was used to log in to the client panel;
8. If you visited this website from another website, we track and save the URL of the forwarding site.

We will use the information you provide to respond to your inquiry or to offer you access to one of our products. In the same time, the password key you receive from NicGrade when you access the products of the Company you may not share it with any other person or entity.

The Company takes the security of all its clients' data very seriously. We take precautions to maintain the security, confidentiality, and integrity of the information we collect. Such measures include limited access to the information to the extent necessary to accomplish our mission. However, any data is stored encrypted in the NicGrade database, only decrypted when displayed with a single, secret key. If your intended email communication is very sensitive, or includes information such as your bank account, we inform you that all the payments are automatically done through the International Payment System Stripe and no need to transfer your legal data thru email or other communication channel. That is why, only the operator-bank processes client data so that in the event of a hack-attack on the database of NicGrade, a third party cannot get access to your information. Access to invoices is also run through a Secure Channel (SSL) based

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on a unique hash link you will receive via email so that the link in the browser cannot be interpreted by others.

All information provided by you and collected by the Company are stored on secure servers in the Hetzner Online GmbH data center, address: Industriestr. 25, 91710 Gunzenhausen, Germany, <https://www.hetzner.com>.

We do not sell or offer any confidential data to third parties!

However, we may disclose Confidential Information unless authorized in writing by you with such information or required to do so by a court order or other governmental or regulatory body; provided that, in such case, we must promptly notify you of such compelled disclosure and shall use all reasonable efforts to prevent or minimize the extent of such disclosure.

As a general rule we would like to give you some recommendations regarding securing your confidential information:

- Be vigilant to protect you Confidential Information,
- Protect assets containing Confidential Information, for example, computers, tablets, cell phones, or electronic storage devices;
- Avoid intentionally or unintentionally posting Confidential Information on any third-party site, including but not limited to, social media sites, networking sites, or trade press sites;
- Be cautious in situations that might result in the inadvertent disclosure of Confidential Information.

We welcome feedback if you have any questions regarding our confidentiality policy or the use of your information.