

Agreement on processing of personal data of the Site Westarp.io users

The current version from February 1, 2019

1. Generalities

On the terms of this Agreement on the processing of personal data (hereinafter - the Agreement), the company «Westarp.io s.r.o.», identification number 074 10 182, legal address: 1215/26 Klimentaska st., Nove Mesto (Klimentská 1215/26, Nové Město), 110 00 Prague - 1, Czech Republic, included in the register of companies of the Municipal court of the city of Prague with number C 300573 (hereinafter - the Platform) provides site users at the following URL: Westarp.io and its subdomains (hereinafter - the Site), with the right to use the Site, with which Users can search properties in the Kingdom of Spain, Czech Republic and the Federal Republic of Germany.

Important: the Platform does not effect direct sale of real estate items to users. Final reservations and purchases are made by Partner (Real estate developer). Responsibility for properly made reservation, purchase and other provision of services to the User is the responsibility of the Partner. The Platform, for its part, undertakes to do everything possible to solve users problems that occur when using Westarp.io, including to provide users with assistance in cooperation with the Partner.

Agreement – this document with all supplements, changes and the obligatory documents specified in it, and also the convention concluded between the Platform and the User by virtue of it.

Westarp.io – online service for finding information about real estate items and other services and offers on the real estate market offered for purchase by Partners, as well as for facilitation (automatization) of the process of their acquisition.

User – an individual accepting the terms of the Agreement having full legal capacity, having its own e-mail address on the Internet, a personal computer and/or a mobile device with Internet access.

Platform – Westarp.io s.r.o. independently or together with other legal entities belonging to its group: Westarp Imnomiliario, S. L., Westarp Reality s.r.o., Westarp Immobilien GmbH, organizing and (or) carrying out processing of personal data, as well as determining the purpose of processing of personal data, personal details subjected to processing, actions (operations) committed with personal data, such as collection, recording, systematization, accumulation, storage, refinement (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data. Personal data can be treated by the Platform automatically or manually.

Personal data – any information that the User provides about himself upon registration on the Site or when logging in via social networks or a Google account, and in the process of further Site use.

Account (Personal account) – a personal section of the Site, to which the User accesses after passing registration and/or authorization on the Site. The account is intended for User's personal data storage or for subsequent use convenience of the Site by the User, viewing and management of available functionality and terms of use of the Site.

2. Personal data collection and storage conditions

Upon authorization the Platform notifies the User about the conditions of collection and storage of Personal data by displaying a notice with text: "**Upon authorization, you agree to the User's Agreement and the Platform Privacy Policy**". When registering an Account or logging in using social networks or a Google account the User freely, voluntarily and for own benefit gives the Platform the perpetual written consent to any ways of processing

of his personal data. The User should check out the terms and conditions of use of his personal data before processing.

The User has the right to withdraw the consent to the processing of his Personal data at any time by sending a request to the Platform for blocking of his Account at info@westarp.io. The Platform stops the processing of Personal data and destroys them in term not exceeding 30 calendar days from the date of receipt of such a demand, other than the data required to be stored in accordance with the current legislation of the Russian Federation. In this case the Platform keeps only depersonalized data of the User in its database systems.

The Platform is not responsible for the completeness and relevance of information about Users. The User has the right to edit his Personal data in his Account provided by him upon registration or authorization at any time.

3. Objectives of the Agreement

The objectives of the Agreement include:

- User Account registration on the Site (conclusion of a convention for Westarp.io use)
- performance of obligations under the concluded conventions by providing the User with access to the Site and its functions, since the party or the beneficiary or the guarantor under such agreement is the User
- participation in research and marketing activities, held by the Platform
- sending of advertising messages to the User and receiving advertising information on telecommunication networks (including mobile communication and e-mail)
- Westarp.io service promotion on the market through the implementation of direct contact with Users via communication networks
- implementation of statistical and analytical internal studies of Westarp.io service use

The Platform may collect and store the following data received from the User:

- name, surname, gender, passport number, date of birth;
- e-mail address;
- IP address, cookies, Internet browsers settings and preferences;

- the service functions use statistics and other technical information.

The Platform for its part synchronizes search history, settings and favorites in the User's personal account.

The Platform can use transborder transmission of personal data in a foreign jurisdiction to a foreign legal entity for the purpose of the User contract execution. When all goals are achieved the Platform can guarantee the User the destruction of his Personal data in a foreign jurisdiction.

4. Security

The Platform stores Personal data and ensures their protection from unauthorized access and distribution in accordance with internal rules and regulations. The User's personal data are stored confidentially, except in cases where the Site technology or the software settings used by the User envisage an open exchange of information with other Site Users or with any users of the Internet.

The Platform has the right to transfer Personal data to third parties in following cases:

- The User expressly consented to such actions
- In connection with the transfer of the Site to ownership, use or property of such third party, including assignment of rights under contracts concluded with the User in favor of such third party
- At the request of a court or other authorized state body within the procedure established by the legislation
- To protect the rights and legitimate interests of the Platform in connection with violation of agreements concluded with the User

5. Final provision

The agreement is regulated and interpreted in accordance with the legislation of the Russian Federation is applied to all Users. All issues not resolved by the Agreement subject to resolution in accordance with Russian Federation legislation. Current version of the Agreement is developed by the Platform on the basis of the Federal law from July 27, 2006 N 152-FZ "On personal data" (With changes and additions from 29.07.2017)

The Platform has the right to carry out processing of personal data without notifying the authorized person body for the protection of personal data rights on the basis of paragraphs 2 paragraph 2 of article 22 of the Federal law of July 27, 2006 N 152-FZ "On personal data".

The agreement can be changed by the Platform unilaterally without pre-notification of the User. New version of the Agreement enters into force from the date of its placement at https://westarp.io/uploads/model_files/options/images/privacy_policy-2.pdf . When changes are made to the current version the date of the last update is specified.