

PRIVACY AND COOKIE POLICY

Last update: 08 of September 2025

Internet Modern Generation LLC, a company duly incorporated in the United States of America, registered address: 1912 Capitol Ave, Ste 500, Cheyenne, Wyoming 82001, the United States of America (**the “Company”, “Service”, “Website”, “Us”, “We”, and “Our”**) in this Privacy and Cookie Policy reflects Our understanding of the importance of Your personal information provided to Us, respects that and strives to be transparent about the technology We use through our Website.

This Privacy and Cookie Policy (“Policy”) describes how we collect and use the personal data you provide through the Website. It also describes the choices available to you regarding our use of your Personal Data and how you can access the information. We respect your privacy and we take protecting it seriously.

This Policy should be read together with our **Terms of Use**.

1. GENERAL INFORMATION

1.1. This Policy applies to the following people:

1.1.1. people who visit our Website (for this Policy, We define the term **“User”, “you”, “your”, “yours”**) as any person who visits our Website and has or intends to have access to our services, specifically, digital marketing, market analysis, consumer research, advertising, etc. (the **“Service” or the “Services”**);

1.1.2. people who connect with Us by email or social networks;

1.1.3. people who connect with Us by contact form on the Website.

1.2. We do not sell your Personal Data to third parties. A “sale” of Personal Data under the [CCPA](#) is defined broadly to include the **“selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means”** the Personal data of an User to another business or third party “for monetary or other valuable consideration”. If We decide to transfer the rights of the Website, We will inform you about this, so you can forbid Us to transfer your Personal Data together with our business. If so, We will delete your Data from the databases prior to a business transfer.

2. PRINCIPLES OF DATA PROCESSING

2.1. According to Art. 5 of the EU General Data Protection Regulation (GDPR), we adhere to the following principles to protect your privacy:

2.1.1.principle of lawfulness, fairness, and transparency - we process personal data lawfully, fairly, and transparently concerning the data subject;

2.1.2.principle of purpose limitation - we collected personal data for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes;

2.1.3.principle of data minimization - we collect adequate personal data, relevant and limited to what is necessary concerning the purposes for which we are processed personal data;

2.1.4.principle of data accuracy - we accurate personal data and, where necessary, keep up to date. We take every reasonable step to ensure that inaccurate personal data, having regard to the purposes for which they are processed, are erased or rectified without delay;

2.1.5.principle of storage limitation - we keep personal data in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal

data are processed;

2.1.6.principle of integrity and confidentiality - we process personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and accidental loss, destruction, or damage, using appropriate technical or organizational measures.

3. PERSONAL DATA THAT WE COLLECT AND PROCESS

3.1. To fulfill our obligations for you according to applicable Terms of Use, We are entitled to ask you to provide Us with your Personal Data, including (but not limited):

3.1.1.Full name (name and surname)

3.1.2.Email address;

3.1.3.Data of messages you share with us.

3.2. We may collect Personal Data from you in a variety of ways and circumstances, including, but not limited to, through your interactions with us, when you complete our related web forms, participate in online chat sessions, filling out a form, providing Us with feedback as well as by providing your login information to sign up for our newsletter. We shall be entitled to combine Personal Data collected in the course of your interaction with different sections of the Service with any other relevant available information.

4. PERSONAL DATA, COLLECTED IN AN AUTOMATIC WAY

4.1. We may also receive personal data in an automatic way when you choose to partner with us on a separate third-party software program, such as Hubspot, hotjar.

4.2. Personal Data automatically collected by or transmitted to Us in the course of accessing, interacting, and operating of the Service may include **information collected by cookies and other similar technologies**. We and our service providers use various technologies to collect information when you interact with us, including cookies and other similar technologies which enables us to collect information about your device identifiers, IP address, web browsers used to visit the Website, pages or features viewed, time spent on the Website, and links clicked. Where required, you will be asked for consent to our use of cookies. To view more information on what cookies we use and how we use them, please review the clause **Cookies** of this Policy.

5. LAWFUL BASIS OF DATA PROCESSING

5.1. Under Art. 6 of the GDPR, we only process personal data, where we have a lawful basis for doing so.

5.2. The processing of Personal Data, described in p. 3.1.1 - 3.1.4 of this Policy is based on **consent** (Art. 6 (1) lit. (a) GDPR) and is performed only for the purposes specified in this Policy — to provide a greater and better experience with Us and other related purposes, which is described in detail in this Policy, in particular, to personalize your experience with our Service and for marketing and promotion of our Services or related products, including those of a third party's products which are related to our Services.

5.3. The processing of Personal Data may be based on a **legitimate interest** (Art. 6 (1) lit. (f) GDPR) and is performed only for the purposes specified in this Policy — to contact you about, and conduct surveys or polls you choose to take part in and to analyze the data collected for market research purposes or for the purpose of preventing fraud.

6. THE PURPOSE OF DATA PROCESSING (USE OF COLLECTED PERSONAL DATA)

6.1. We may use the data collected from you for a variety of purposes, primarily, relating to providing our Services and information about our Services. We may also use the information for such other purposes as otherwise allowed by law. We may use your personal data for such purposes, including, but not limited to:

- 6.1.1.** provide access to Website;
- 6.1.2.** handle your orders and requests, including requests for technical support and assistance;
- 6.1.3.** provide a greater and better experience using Website;
- 6.1.4.** detect, investigate, and prevent illegal activities or conduct that may violate the Terms of Use and this Policy;
- 6.1.5.** personalize your experience with our Service;
- 6.1.6.** contact you and to analyze the data collected for market research purposes;
- 6.1.7.** conduct internal research and development and to improve, test, and enhance the features and functions of our Service;
- 6.1.8.** for marketing and promotion of our Services or related products, including those of a third party's products which are related to our Services (If you do not want us to use your data in this way, please let us know by contacting us by mail;
- 6.1.9.** meet our internal and external audit requirements, including our information security obligations;
- 6.1.10.** tracking usage data;
- 6.1.11.** any other purpose as we determine, in our sole discretion, to be necessary or required to ensure the safety and/or integrity of our users, employees, third parties, public, and/or our Services, or to comply with requirements of any applicable law.

7. CONSENT TO PERSONAL DATA PROCESSING

7.1. Consent to Personal Data Processing

7.1.1. By expression of consent of this Policy, you approve to have reached the age of majority or the legal age in your jurisdiction (generally 18 or older), are solely responsible for all your actions, and fully understand the statements outlined in this Policy.

7.2. EU Persons Consent to Personal Data processing

7.2.1. We process the Personal Data of EU residents, as required by the GDPR, only on the basis of a free, specific, informed, and unambiguous expression of your will, by which you confirm your consent to the processing of your Personal Data (“**Consent**”).

7.2.2. You may express your consent by contacting us on the Website. Then you irrevocably and unconditionally agree that we have the right to process your personal data in the manner specified with your Consent.

7.2.3. Your Consent covers all processing activities with your Personal Data carried out for the same purpose or purposes. When the processing has multiple purposes, your Consent should be deemed given for all of them.

7.3. Non-EU Persons Consent to Personal Data processing

7.3.1. If you are not an EU Person, by transferring to Us your Personal Data via the Website or otherwise, you irrevocably and unconditionally consent and agree that We shall be entitled, in accordance with this Policy:

7.3.1.1. to process in any manner, including to collect, store, use, disclose, share and transfer (including cross-border), your Personal Data so provided to Us, as well as your Personal Data collected from your use of the Service (i.e. your Personal Data which We collect automatically and/or from other sources); and

7.3.1.2. to use cookies to collect your Personal Data.

8. COMPLIANCE WITH GENERAL DATA PROTECTION REGULATION (GDPR), CALIFORNIA CONSUMER PRIVACY ACT (CCPA) AND OTHER LAWS

8.1. If you are located in the European Economic Area (EEA) privacy rights are granted and all processing of Personal Data is performed by regulations and rules following the [Regulation \(EU\) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons concerning the processing of Personal Data and on the free movement of such data, known as the General Data Protection Regulation](#) (“GDPR”).

8.2. If you are located in California, all processing of Personal Data is performed in accordance with regulations and rules following the [California Consumer Privacy Act](#), Cal. Civ. Code § 1798.100 *et seq.* (“CCPA”).

8.3. If you are located in Brasil, all processing of Personal Data is performed in accordance with regulations and rules following the [Lei Geral de Proteção de Dados](#) (“LGPD”).

8.4. If you are located in the United Kingdom, all processing of Personal Data is performed in accordance with regulations and rules following [the Data Protection Act 2018](#) (“DPA 2018”) and UK General Data Protection Regulation (“UK GDPR”).

8.5. If you are located in Australia, all processing of Personal Data is performed in accordance with regulations and rules following [the Privacy Act 1988](#).

8.6. If you are located in Canada, all processing of Personal Data is performed in accordance with regulations and rules following [Personal Information Protection and Electronic Documents Act \(S.C. 2000, c. 5\)](#) (“PIPEDA”).

8.7. If you are located in New Zealand, all processing of Personal Data is performed in accordance with regulations and rules following [Privacy Act 2020](#).

9. THE RIGHTS OF USERS

9.1. Subject to possible restrictions under national law, as a data subject under the GDPR, you may have certain rights regarding the Personal Data that we collect on you.

9.2. Under Chapter 3 of the General Data Protection Regulation (GDPR), the rights of the data subjects include the following:

9.2.1.Right to access. You may contact us to get confirmation as to whether or not we are processing your Personal Data. We will inform You upon Your request of what categories of Personal Data we process regarding You, the processing purposes, the categories of recipients to whom personal data have been or will be disclosed, and the envisaged storage period or criteria to determine that period;

9.2.2.Right to withdraw consent. You may withdraw the consent at any time by contacting us. You can withdraw your consent at any time by replying to the email with your withdrawal and your Personal Data will be deleted immediately. Withdrawing consent may lead to fewer possibilities to use the Service;

9.2.3.Right to object. In case our processing is based on a legitimate interest to run, maintain and develop our business, You have the right to object at any time to our processing. We shall then no longer process your Personal Data unless for the provision of our services or if we demonstrate other compelling legitimate grounds for our processing that override your interests, rights, and freedoms or for legal claims. Notwithstanding any consent granted beforehand for direct marketing purposes, You have the right to prohibit us from using personal data for direct marketing purposes, by contacting us, or unsubscribe possibilities in connection with our direct marketing messages;

9.2.4.Right to restriction of the processing. You have the right to obtain from us restriction of processing of your Personal Data, as foreseen by applicable data protection law, e.g. to allow our verification of the accuracy of personal data after you contest the accuracy or to prevent us from erasing personal data when personal data are no longer necessary for the purposes but still required for your legal claims or when our processing is unlawful. Restriction of processing may lead to fewer possibilities to use the Website;

9.2.5.Right to data portability. You have the right to receive your personal data from us in a structured, commonly used, and machine-readable format and to independently transmit those data to a third party, in case our processing is based on your consent and carried out by automated means;

9.2.6.Right to complain. You have the right to complain with any relevant Data Protection Authority, in particular in the Member State of your residence, place of work, or the place of processing your personal data. If You wish to exercise any of the aforementioned rights, please contact Us.

9.2.7.How to use these rights. To exercise any of the above-mentioned rights, You should primarily use the functions offered by the Website. If such functions are however not sufficient for exercising such rights, You shall contact us through the Website, providing including the following information: name, address, phone number, email address, and a copy of a valid proof of identity. We may request additional information necessary to confirm your identity. We may reject requests that are unreasonably repetitive, excessive, or manifestly unfounded.

10. DATA STORING AND DELETION

10.1. We store your Personal Data for as long as needed to provide you with our Service. We may store Data longer, but only in a way that it cannot be tracked back to you. When Personal Data is no longer needed, we delete it using reasonable measures to protect the Data from unauthorized access or use.

10.2. EU Territory. We store Personal Data as long as it is needed for the provision of our Service. Traffic information is erased or made anonymous when it is no longer needed for the transmission or, in the case of payable Service, up to the end of the period during which the bill may lawfully be challenged or payment pursued. Direct marketing and provision of value-added Service information (including traffic information used for these purposes) are stored as long as the same is necessary for the provision of these activities, or up to the time when a User opts out from such use under this Policy. Other information is stored for as long as we consider it to be necessary for the provision of our Service. This Section shall not prevent any technical storage or access to information for the sole purpose of carrying out the transmission of a communication or as strictly necessary for us to provide the Service you requested.

10.3. As explained in the GDPR statement, We strive to anonymize the data when possible. If you decide to exercise your right to erasure, We will also inform our providers to delete all your data.

10.4. US Territory. We will retain collected information for the period necessary to fulfill the purposes outlined in this Policy unless a longer retention period is required or permitted by applicable legislation.

10.5. Storing might be different depending on the territory of collecting the information and the applicable legislation, but we always strive to store the information only as long as it is needed to provide, improve, or personalize our Service.

11. DATA SECURITY

11.1. We care to ensure the security of Personal Data. We follow generally accepted industry standards to protect the information submitted to Us, both during transmission and once We receive it. We maintain technical, physical, and administrative security measures to provide reasonable protection for your Personal Data.

11.2. We may grant access to your personal data to our contractors or employees, in particular in sales support, with the guarantee that they comply with the necessary level of protection of your personal data against unauthorized access, loss, manipulation, falsification, and destruction, or unauthorized disclosure. This is done through appropriate administrative, technical, and physical measures on our part

11.3. There is no 100% secure method of transmission over the Internet or method of electronic storage. Therefore, we cannot guarantee its absolute security.

11.4. We never process any kind of sensitive data or criminal offense data. Also, we never undertake to profile personal data.

12. CONTRACTORS

12.1. We work with third-party services providers, who provide website, application development, hosting, maintenance, and other services for us. They may be located outside of the EEA. These contractors may have access to, or process Personal Data on behalf of Us as part of providing those services for Us. We limit the information provided to these Service providers to that which is reasonably necessary for them to perform their functions.

12.2. All data transfers are performed in accordance with the highest security regulations. Transfer of Personal Data to countries outside of the European Economic Area may be possible only in the case when we have obtained your consent for it.

12.3. All data processed by Us is stored exclusively in secure hosting facilities.

13. COOKIES

13.1. Cookies is a small text file that is settled on your computer or other devices when you visit certain web pages that collect information about your preferences and activities. Cookies allow our systems to recognize your internet browser or device and help our Services function effectively.

13.2. Cookies are useful because they allow our systems to recognize your internet browser or device and help our Services function effectively.

13.3. Cookies perform many different functions, such as letting you navigate between pages efficiently, remembering your preferences, and generally improving your experience. They can also help to ensure that advertisements you see online are more relevant to you and your interests.

13.4. We use cookies within following purposes:

13.4.1.Advertising. Cookies allow us to display advertisements and recommend our products and services based on that activity. Our partners may also use Cookies to determine whether an advertisement has been shown and evaluate its ability to generate leads for our Company, or to provide us with information about your interaction with the advertisement.

13.4.2.Performance and analytics. We use cookies to improve our Service. By using cookies, we and our partners generate analytics about your use of our Services to track traffic, improve our Services, and make our Services easier to use and more relevant to you.

13.5. Consent. To the extent that information processed in connection with cookies should qualify as personal data, the legal ground for that processing is your consent (Art. 6 (1) lit. (a) GDPR). Therefore, by clicking “**Yes**” or “**Accept**” or **similar** on the cookie banner you give your consent to us to place and/or read several types of cookies from this Website.

13.6. We use several different types of cookies. Some of these are session cookies which are temporary and allow us to link your actions during a Website session. Session cookies are erased when you leave the Website. Other cookies are persistent cookies that remain on your device for the period specified in the cookie.

13.7. Depending on their function and their intended purpose, cookies can be assigned to the following categories:

13.7.1. Strictly necessary cookies. Strictly necessary cookies are required to improve your experience of using our Service. Strictly necessary cookies dealing with preferences, keep our Service secure, including preventing fraudulent or disruptive activity. Without these cookies, certain basic functionalities cannot be offered. Strictly necessary cookies are always active and will be placed without your consent. These cookies cannot be disabled.

13.7.2. Performance cookies. Performance cookies collect information on your usage of our Website. They identify e.g. the country or region of our users, a total number of users of our Service, operating system, visited websites, following links, duration, and several website visits, previously visited websites, most commonly visited websites, and errors you experienced. The information collected is aggregated and anonymous. It does not allow personal identification. It only serves the purpose of evaluating and enhancing the experience of our Website. To the extent that information processed in connection with performance cookies should qualify as personal data, the legal ground for that processing is your **consent (Art. 6 (1) lit. (a) GDPR)**.

13.7.3. Marketing cookies. We may use marketing techniques to promote our Services to you, which may be personalized to you based on your use of the services and/or your perceived interests. To the extent that information processed in connection with marketing cookies should qualify as personal data, the legal ground for that processing is your **consent (Art. 6 (1) lit. (a) GDPR)**.

13.7.4. Preferences cookies. Preference cookies allow us to remember choices you make and provide more enhanced personal features. To the extent that information processed in connection with preference cookies should qualify as personal data, the legal ground for that processing is your **consent (Art. 6 (1) lit. (a) GDPR)**.

13.8. We use third-party cookies to help us with providing and operating Service effectively and to provide marketing functionality, as described in the previous section. These third-party providers use and control cookies on our service, which may be used for their own purposes, including the purpose of tracking your browsing behavior across multiple websites. We undertake checks to ensure that these companies keep your data secure and handle it fairly and responsibly.

13.9. We may cooperate with third-party companies for greater assurance of advertisements about our Service that may arouse your interest. These third-party advertisers may use cookies to collect information about you when you use the Service. They may collect information about your online activities over time and across different websites, or other online services. They may use this information to provide you with interest-based advertising or other targeted content.

13.10. The third-party advertisement serving companies and other unaffiliated advertisers also display advertisements on our Services. As part of their service, they may place a separate cookie to collect information such as your IP address, the server your computer is logged onto, the area code and zip code associated with your server, and other information about your device, browser, or operating system, and whether you responded to a particular advertisement. We do not control and are not responsible for the way and type of using and storage cookies by third parties. Please visit the sites of third parties at the links above to review their privacy and cookie policies. We may add or change the list of third party ad servers from time to time and we encourage you regularly to check this section for changes.

13.11. When we work with third-party vendors to apply cookies on our behalf and they have access to personal data collected through cookies or, they are subject to appropriate contractual safeguards under the requirements of the GDPR and ePrivacy Directive (EPD) has become known as the “Cookie law”. We retain personal data collected through cookies necessary for personalized services when you have consented to the use of cookies for those purposes, and only for the time necessary to aggregate personal data that we use for website performance and measurement of the audience.

14. INFORMATION RELATING TO CHILDREN

14.1. We do not intentionally collect or maintain information from persons under the age of 18, however, according to each country and its laws, the processing of the personal data of a child will be lawful where the child is at another age.

14.2. If we determine upon collection that a user is under this age, we will not use or maintain his/her Personal Information without the parent/guardian’s consent. If we become aware that we have unknowingly collected personally identifiable information from a child under the age of 18, we will make reasonable efforts to delete such information from our records.

14.3. We also recommend that parents monitor their children’s Internet activities and learn and employ software or other tools that can help their children enjoy their online experience without compromising their personal safety or allowing them to use the Internet in a manner inconsistent with their parent/guardian’s preferences.

15. APPLICATION OF THIS POLICY

15.1. This Policy applies to the Website. Once redirected to another website, this Policy is no longer applicable.

16. ACCEPTANCE OF THESE TERMS

16.1. By using the Website, you agree with this Policy.

16.2. We assume that all Users have carefully read this document and agree to its content. If one does not agree with this Policy, they should not use this Website.

17. CHANGES AND UPDATES TO OUR POLICY

17.1. From time to time, we may update this Policy. We encourage You to periodically check back and review this Policy so that You always will know what data we collect, how we use it, and with whom we share it.

18. CONTACT US

18.1. If you have any questions, suggestions, or comments, please contact us via Contact Us form.