

QPIX Privacy Policy

This Privacy Policy describes how we – QPIX LLC (“**QPIX**”, “**we**”, “**our**” or “**us**”) – collect, store, use and disclose personal data regarding individuals (“**User(s)**” or “**you**”) who:

- 1 visit, use or otherwise interact with our website, available at qpix.com.ua, or any other website, webpage, e-mail, text message or online ad under our control (collectively - “**Sites**”);
- 2 use our web and mobile applications (together with the Sites – the “**Services**”), which allow them to have their images and pictures (“**Images**”) printed and delivered to them (all in accordance with our [Terms of Service](#)).

Specifically, this Privacy Policy describes:

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Please read this Privacy Policy carefully and make sure that you fully understand and agree to our practices. Remember: you are not legally required to provide us with any personal data, and may do so (or avoid doing so) at your own free will.

If you do not wish to provide us with your personal data, or to have it processed by us, please simply do not use our Services. You may also request to delete certain data, but please keep in mind that limiting our processing may also result in us not being able to provide you with the full range of our Services, or with the best user experience when using our Services.

We act according the Law of Ukraine "Protection of Personal Data" №. 2297-VI.

1 Data Collection

We collect the following categories of data (which, to the extent it relates to an identified or identifiable individual, will be deemed as “**Personal Data**”):

Data automatically collected or generated: When you interact with or use our Services, we may collect certain technical data about you such as your operating system, IP address, device identifier and, subject to your consent as may be required under applicable law, (geo) location, as well as your browsing history and any data regarding your purchase history on our Services. We collect or

generate such data either independently or with the help of our Service Providers, including through the use of "cookies" and other tracking technologies.

Data received from you: You may provide us with Personal Data such as your name, e-mail, phone number, shipping address and payment method (credit card), and any other data you choose to provide when you contact us or otherwise submit any forms on our Services.

Images you upload: Our Services enable you to select and upload Images, either independently from your device, or through linking your account on other websites or social media (such as your Facebook, Instagram, Pinterest or Google accounts), and once linked we will gain limited access to certain data and Images on such linked account(s).

Data received from third party services: Our Services may be used in connection with third party services, sites, and mobile applications. If you use our Services with or through such third parties, we may receive Personal Data about you from such third parties. Please note that when you use such third party services, sites and mobile applications, their own terms and privacy policies will govern your use of those services.

Data obtained through Analytics Tools: We use analytics tools (e.g. Google Analytics) to collect data about the use of our Sites and Services. Analytics tools collect data such as how often Users visit or use the Sites or Service, which pages they visit and when, and which website, ad or e-mail message brought them there. You can find more information about how Google collects information and how you can control such use at <https://policies.google.com/technologies/partner-sites>.

2 Data Uses

We use your Personal Data as necessary for the performance of our Services; for complying with applicable law; and based on our legitimate interests in maintaining and improving our Services and offerings, understanding how our Services are used, optimizing our marketing, customer service and support operations, and protecting and securing our Users, ourselves and members of the general public.

Specifically, we use Personal Data for the following purposes:

- To facilitate, operate, and provide the Services;
- To authenticate the identity of our Users, and to allow them to access and use our Services;
- To provide our Users with assistance and support;
- To develop, customize and improve the Services and our Users' experience, based on common or personal preferences, experiences, difficulties and feedback;
- To accurately crop the Images you upload through the use of facial recognition software (solely for such purpose);
- To contact our Users with general or personalized service-related messages (such as password-retrieval or billing); or with promotional messages (such as newsletters, special offers, new features etc.); and to facilitate, sponsor and offer certain events and promotions;

- To support and enhance our data security measures, including for the purposes of preventing and mitigating the risks of fraud, error or any illegal or prohibited activity;
- To create aggregated statistical data, inferred non-personal data or anonymized or pseudonymized data (rendered non-personal), which we or our business partners may use to provide and improve our respective services;
- To comply with any applicable laws and regulations.

We do not sell your Personal Data (or "Personal Information").

3 Data Location

We and our authorized Service Providers maintain, store and process Personal Data in Ukraine reasonably necessary for the proper performance and delivery of our Services, or as may be required by law.

QPIX LLC. is headquartered in Ukraine, a country which is considered to be offering an adequate level of protection for the Personal Data. QPIX and Service Providers are each committed to protect Personal Data in accordance with this Privacy Policy, customary industry standards, and such appropriate lawful mechanisms and contractual terms requiring adequate data protection, regardless of any lesser legal requirements that may apply in the jurisdiction from which such data originated.

4 Data Retention

We retain data solely as necessary for the purposes described in this Privacy Policy.

To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether those purposes can be achieved through other means, as well as applicable legal requirements.

We will also keep and use such Personal Data for as long as is required in order to comply with our legal and contractual obligations, or to protect ourselves from any potential disputes (i.e., as required by laws applicable to records and bookkeeping, and in order to have proof and evidence concerning our relationship or your use of our Services, should any legal issues arise in the future), in accordance with our data retention policy.

Images in particular will be retained until your account has been terminated, either by us or by you. Any Images which have been uploaded to the Services but were not eventually chosen to be printed will be automatically deleted, after ten (10) days from the day you have uploaded the Image(s).

You may ask us to delete any Personal Data, including Images, by sending us an email to alyona@cloudareus.com. We may delete any data or Images from our systems, without notice to you, including once we deem it no longer necessary for the purposes set forth in this Privacy Policy. We may also retain your data in an anonymized form.

Please note that unless required by applicable law, we will not be obligated to retain your data for any particular period, and are free to securely delete it for any reason and at any time, with or without notice to you.

If you have any questions about our data retention policy, please contact us at: alyona@cloudareus.com.

5 Data Sharing

Legal Compliance: we may disclose or allow government and law enforcement officials access to certain Personal Data, in response to a subpoena, search warrant or court order (or similar requirement), or in compliance with applicable laws and regulations. Such disclosure or access may occur if we believe that we are legally compelled to do so and solely to the extent that we believe is strictly necessary to comply, or that such disclosure is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspected illegal activity, fraud, or other wrongdoing.

Service Providers: we may engage selected business partners, third-party companies and individuals, affiliates, subcontractor and sub-processors (collectively “**Service Providers**”) to perform services complementary to our own (e.g. manufacturing, printing and shipping services, payment processing, IT and system administration services, data backup, security and storage services, data analytics, marketing etc.). These Service Providers may have access to some or all of your Personal Data processed by us, depending on each of their specific roles and purposes in facilitating and enhancing our Services, and may only use it for such purposes.

Sharing your Feedback or Recommendations: If you submit a public review or feedback, note that we may (at our discretion) store and present your review to other users of our Sites and Services. If you wish to remove your public review, please contact us at alyona@cloudareus.com. If you choose to send others an e-mail or message inviting them to use the Services, we will use the contact information you provide us to automatically send such invitation e-mail or message on your behalf. Your name and e-mail address may be included in the invitation e-mail or message.

Protecting Rights and Safety: we may share your Personal Data with others if we believe in good faith that this will help protect the rights, property or personal safety of QPIX, any of our Users or any members of the general public.

6 Cookies and Tracking Technologies

Our Services and some of our Service Providers utilize "cookies", anonymous identifiers, container tags and other tracking technologies which help us provide, secure, analyze and improve our Services, personalize your experience and monitor and analyze the performance of our activities and campaigns.

Such cookies and similar files or tags may also be temporarily placed on your device. Certain cookies and other technologies serve to recall Personal Data, such as an IP address, previously indicated by a User.

Please note that we do not change our practices in response to a “Do Not Track” signal in the HTTP header from a browser or mobile application, however, most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser.

7 Communications

Service Communications: we may contact you with important information regarding our Services. For example, we may notify you (through any of the means available to us) of order summaries and shipping updates, changes or updates to our Services, etc. You will not be able to opt-out of receiving such service communications.

Notifications and Promotional Communications: we may send you messages and notifications about new features, offerings, events and special opportunities, and any other information we think our Users will find valuable. We may provide such notices through any of the contact means available to us (e.g. SMS, mobile notifications or e-mail), through the Services, or through our marketing campaigns on any other sites or platforms.

If you wish not to receive such promotional communications via SMS, notifications or e-mail, you may notify QPIX at any time by e-mailing us at alyona@cloudareus.com or by following the "unsubscribe", "stop" or "change e-mail preferences" instructions contained in the promotional communications you receive.

8 Data Security

In order to protect your Personal Data held with us and our Service Providers, we are using industry-standard physical, procedural and electronic security measures (such as access control, secure servers, firewalls, internal policies, encryption, database backup etc.). However, please be aware that regardless of any security measures used, we cannot and do not guarantee the absolute protection and security of any Personal Data stored with us or with any third-parties.

9 Data Subject Rights

Individuals have rights concerning their Personal Data. If you wish to exercise your privacy rights under the laws that apply to you, such as the right to request access to, and rectification or erasure of your Personal Data held with QPIX, or to restrict or object to such Personal Data’s processing, or to port such Personal Data, or the right to equal services and prices (each to the extent available to you under the laws which apply to you) – please contact us by e-mail at: alyona@cloudareus.com.

Please also note that some of your Personal Data may be processed by other parties acting as ‘data controllers’, such as Facebook, Pinterest and Google. For any requests to exercise such rights with respect to such parties’ processing activities, please contact the relevant party directly.

When you ask us to exercise any of your rights under this Privacy Policy or applicable law, we may need to ask you to provide us certain credentials to make sure that you are who you claim you are, to avoid disclosure of Personal Data relating to other individuals, and to ask you to provide further

information to better understand the nature and scope of data that you wish to access or have deleted etc. Such additional data will be then retained by us for legal purposes (e.g. as proof of the identity of the person submitting the request). We may redact from the data which we will make available to you, any personal data related to others.

10 Data Controller/Processor

Certain data protection laws and regulations, typically distinguish between two main roles for parties processing Personal Data: the “**data controller**” (“**business**”), who determines the purposes and means of processing; and the “**data processor**” (“**service provider**”), who processes the data on behalf of the data controller (or business). Below we explain how these roles apply to our Services, to the extent that such laws and regulations apply.

QPIX is the “data controller” of its Users’ data, and assumes the responsibilities of data controller (solely to the extent applicable under law), as set forth in this Privacy Policy. In such instances, our Service Providers processing such data will assume the role of “**data processor**”.

QPIX is a “co-controller” of certain portions of its Users’ data, alongside such Service Providers that process Personal Data for both QPIX’s analytics and marketing purposes - and the Service Providers’ own purposes. In such cases, such Service Providers (e.g. Facebook and Google) will in such circumstances be deemed as “co-controllers” of such data, which would typically relate to Users who also use the Service Provider’s own platforms. If you wish to limit such independent activities by these Service Providers, consider disabling third-party cookies.

11. Additional Information and Contact Details

Updates and amendments: we may update and amend this Privacy Policy from time to time by posting an amended version on our Services. The amended version will be effective as of the published effective date. We will provide a 10-days’ prior notice if any substantial changes are involved, via any of the communication means available to us, or on the Services. After this notice period, all amendments shall be deemed accepted by you.

External links: while our Services may contain links to other websites or services, we are not responsible for their privacy practices, and encourage you to pay attention and to read the privacy policies of each and every website and service you visit. This Privacy Policy applies only to our Services.

Our Services are not designed to attract children under the age of 18: we do not knowingly collect Personal Data from children and do not wish to do so. If we learn that a child is using the Services, we will attempt to prohibit and block such use and to promptly delete any Personal Data stored with us which we deem to relate to such child. If you believe that we might have any such data, please contact us at alyona@cloudareus.com.

Questions, Concerns or Complaints: If you have any comments or questions about this Privacy Policy or if you have any concerns regarding your privacy, please contact us at alyona@cloudareus.com.