PRIVACY POLICY

Last Updated: November 16, 2026

We, Proxima Research International LLC ("Proxima Research International," "we," or "us"), and our affiliated entities are committed to protecting your privacy and complying with the requirements of Ukraine's Law "On Personal Data Protection."

This Privacy Policy explains how Proxima Research International collects, uses, and discloses information about you. It applies when you use our website https://proximaresearch.com/ua/, mobile applications, and other products and services (collectively, "Services"), contact our support service, interact with us on social media, or otherwise communicate with us.

We may change this Privacy Policy from time to time. If we make changes, we will notify you by updating the date at the bottom of this policy, and in some cases, we may provide additional notice (such as adding an announcement to our website or sending you a notification). We recommend that you regularly review this Privacy Policy to stay informed about our information practices and your options.

1. INFORMATION COLLECTION

1.1. Information You Provide to Us

We collect information that you provide to us directly, including:

• **Contact Information**: First name, last name, email address, phone number, postal address. • **Company Information**: Company name, position, field of activity. • **Message Content**: Information you provide when filling out forms, contacting support, or engaging in other forms of communication with us.

In some cases, we may also collect information that you provide about other persons, for example, when you fill out a form on their behalf. We will use this information only to fulfill your request.

1.2. Information We Collect Automatically

When using our Services, we may automatically collect:

• **Log Data**: IP address, browser type, browser language, date and time of access, pages you visit, time spent on them. • **Device Information**: Device model, operating system, unique device identifiers. • **Usage Data**: Information about how you interact with our Services. • **Cookies and Similar Technologies**: We use cookies and web beacons to collect information about your activity.

1.3. Information from Other Sources

We may receive information about you from third parties, such as social networks or analytics providers.

2. USE OF INFORMATION

We use collected information for:

• Providing and supporting our Services. • Processing transactions and sending related messages (confirmations, receipts). • Sending you technical notices, security updates, and support messages. • Responding to your requests and providing customer support. • Monitoring and analyzing trends, usage, and activities in connection with our Services. • Detecting, investigating, and preventing fraud and other illegal activities. • Complying with Ukrainian legal requirements. • Other purposes about which we notify you at the time of information collection.

2.1. Legal Basis for Processing

We process your personal data on the following legal bases:

• **Your Consent**: For marketing communications, use of cookies for analytics and advertising, participation in surveys and research. • **Contract Performance**: For providing our services, processing orders, creating and managing your account, processing payments. • **Legitimate Interests**: For improving services, internal analytics, ensuring security of our systems, fraud prevention, direct marketing (with opt-out rights). • **Legal Obligations**: For compliance with Ukrainian legislation requirements, tax reporting, responding to law enforcement requests, executing court decisions. • **Vital Interests**: In emergency situations to protect life and health.

You have the right to withdraw your consent at any time. This will not affect the lawfulness of processing carried out based on consent before its withdrawal.

3. INFORMATION DISCLOSURE

We may share your information with third parties in the following cases:

• **Service Providers**: Companies that provide us with services (hosting, analytics, payment processing) and need access to information to perform their tasks. • **Legal Requirements**: If necessary under Ukrainian law or to respond to legal processes. • **Rights Protection**: If we believe that your use of the Services violates our terms or policies, or to protect the rights, property, and security of Proxima Research International, our users, or other persons. • **Professional Advisors**: Our lawyers and other consultants for advice or protection of our interests. • **With Your Consent**: In cases where you provide consent for such transfer. • **Aggregated Information**: We may share aggregated or de-identified information that cannot identify you.

4. COOKIES AND TRACKING TECHNOLOGIES

4.1. Use of Cookies

We use cookies and similar technologies, including pixels, tags and scripts, to ensure the proper operation and security of our website, remember user preferences, analyze website traffic and performance and, where applicable, support advertising and marketing activities.

Depending on their purpose, cookies may be strictly necessary, functional, analytical or advertising-related. These technologies may collect information such as device and browser details, IP address, cookie identifiers and information about how you interact with our website.

Information about the cookies actually used, their purposes, providers, categories and retention periods is available through our cookie consent banner or settings interface.

4.2. Consent and Cookie Preferences

We apply cookie consent and preference mechanisms in accordance with applicable law and our cookie management policy. Where prior consent is required, non-essential cookies and related tracking technologies remain disabled until the user provides consent. Where permitted by law, cookies may be used subject to applicable requirements and the user's preferences.

Depending on the available settings, you may accept or reject non-essential cookies, select individual categories and change or withdraw your consent at any time. Strictly necessary cookies may operate without consent where permitted by law and where they are genuinely necessary for the operation or security of the website.

Where required by applicable law, we also provide mechanisms to opt out of the sale or sharing of personal information or its use for targeted advertising, or limit the use of sensitive personal information where applicable and recognize applicable browser-based opt-out signals, including Global Privacy Control (GPC).

4.3. Third-Party Technologies and Retention

Some cookies and similar technologies may be provided by third parties, such as analytics, security, advertising or website functionality providers. Their use is subject to applicable legal requirements and relevant privacy notices.

Cookies may be session-based, expiring when you close your browser, or persistent, remaining on your device for a specified period or until deleted. Retention periods depend on the purpose and configuration of each cookie and may be displayed in the cookie settings interface.

4.4. Further Information

You may also manage or delete cookies through your browser settings, although blocking certain cookies may affect website functionality. Browser settings do not necessarily replace the consent or opt-out mechanisms required by applicable law.

5. YOUR RIGHTS AND CHOICES

Under Ukraine's Law "On Personal Data Protection," you have the right to:

• Know about sources of collection, location of your personal data, and purpose of their processing.

• Access your personal data. • Demand updating, correction, or deletion of your personal data. • Object to processing of your personal data. • Protect your personal data from unlawful processing and accidental loss.

5.1. For European Union Residents (GDPR)

In addition to the above rights, you have:

• **Right to Data Portability**: Receive your personal data in a structured, commonly used, and machine-readable format and transfer it to another controller. • **Right to Restriction of Processing**: Demand restriction of processing of your data under certain circumstances. • **Right Not to be Subject to Automated Decision-Making**: Not be subject to a decision based solely on automated processing, including profiling. • **Right to Lodge a Complaint with Supervisory Authority**: Contact the appropriate data protection authority in your country. • **Right to be Forgotten**: Demand deletion of your personal data under certain circumstances.

5.2. For Kazakhstan Residents

Under the Law of the Republic of Kazakhstan "On Personal Data and Their Protection," you have the right to:

• Right to receive information about third parties to whom your personal data is transferred. • Right to demand blocking of unlawfully processed personal data. • Right to withdraw consent for collection and processing of personal data at any time. • Right to receive information about the existence of your personal data in the database. • Right to demand clarification regarding the procedure for protecting your rights.

5.3. For Uzbekistan Residents

Under the legislation of the Republic of Uzbekistan on personal data, you have the right to:

• Right to free access to your personal data. • Right to demand cessation of use of personal data for direct marketing purposes. • Right to compensation for material and moral damage caused by unlawful processing of personal data. • Right to demand notification of all third parties about changes made or deletion of personal data. • Right to anonymity when using certain types of services.

How to Exercise Your Rights

You can contact us using the contact information provided in Section 8. Contact Us, to exercise your rights.

6. INFORMATION PROTECTION

We implement appropriate technical and organizational measures to protect your personal data from:

• Unauthorized access. • Disclosure or alteration. • Accidental or unlawful destruction.

Our employees who have access to personal data are obligated to maintain confidentiality and not

disclose information without your consent.

7. INFORMATION TRANSFER

Your information may be transferred and stored outside Ukraine, for example, on servers located in other countries. We ensure an appropriate level of personal data protection during such transfers in accordance with Ukrainian legislation and applicable international standards.

8. CONTACT US

If you have questions or wish to exercise your rights, please contact us:

Proxima Research International LLC • Address: 03037, Ukraine, Kyiv, Bazhana Ave., 10A • Email: dataprotection@proximaresearch.com • Phone: (044) 585-97-10

9. DATA RETENTION PERIODS

We retain your personal data for the period necessary to achieve the purposes specified in this Policy, or in accordance with legal requirements:

Account Data: During account activity plus 3 years after last activity. • **Transaction Data and Financial Documents**: 5 years in accordance with Ukrainian tax legislation. • **Marketing Data**: Until consent withdrawal or 3 years from last interaction. • **Cookie Data**: From session cookies (deleted after browser closure) to maximum 2 years. • **Support Service and Correspondence Data**: 3 years after request resolution. • **Data for Legal Obligations**: According to terms established by legislation. • **Data for Legal Dispute Protection**: During the limitation period plus 1 year.

After the retention period expires, personal data is deleted or de-identified in such a way that it cannot be used to identify a specific person.

10. CHILDREN

Our Services are not intended for persons under: • 16 years old for residents of Ukraine and the European Union • 18 years old for residents of other jurisdictions

We do not knowingly collect personal data from children under the specified age. If you are a parent or guardian and have learned that your child has provided us with personal data without your consent, please contact us using the contact information specified in Section 8. We will take necessary measures to delete such information from our systems.

If we become aware that we have accidentally collected personal data from a child, we will immediately delete such data unless we are required to retain it under law.

11. AUTOMATED DECISION-MAKING AND PROFILING

We may use automated systems to process your personal data, including:

11.1. Purposes of Automated Processing

• Analysis of service usage to improve functionality and user experience. • Fraud detection and prevention, ensuring security of our systems. • Content personalization, recommendations, and marketing offers. • Credit assessment when providing services with deferred payment. • User segmentation for marketing purposes.

11.2. Your Rights Regarding Automated Processing

• You have the right not to be subject to a decision based solely on automated processing if such decision has legal effects for you or similarly significantly affects you. • You may demand human intervention in the decision-making process. • You have the right to express your point of view and challenge the decision. • You may request information about the logic of automated decision-making.

11.3. Exceptions

Automated decision-making may be carried out if it is: • Necessary for entering into or performance of a contract between you and us. • Permitted by Ukrainian or EU legislation. • Based on your explicit consent.

To exercise your rights regarding automated processing, please contact us using the contact information in Section 8.