

PRIVACY POLICY

This Privacy Policy ("Privacy Policy") is designed to provide you with information on the processing of your personal data (any information relating to you) by the Platform lava.top ("Platform" or "we" or "us" or "our"). We help content creators ("Authors") promote their content and make it a profitable business. We do that by providing Authors with access to an audience that buys their content ("Customers"). Our Authors receive income from selling content and Customers get access to such exclusive content. Our Platform can also be visited by those who are not yet Authors or Customers but are interested in our service ("Visitors"). Authors, Customers and Visitors are collectively referred to as "Users".

This Privacy Policy contains important information on the collection and use of your personal data; the legal grounds for the processing of that data; disclosures of that personal data to third parties and the use of cookies by the Platform.

This Privacy Policy is based on the provisions of the General Data Protection Regulation ("GDPR") as well as the Law of the Republic of Cyprus 125(I) of 2018.

1. Controller

The data controller concerning personal data processed under this Policy is LAVALANE LTD, registered under the law of the Republic of Cyprus with registration number HE 387079 (Kallipoleos, 3, Flat/Office 102, 1055, Nicosia, Cyprus).

Depending on the specific purpose and other circumstances of data processing, The Platform may act as a controller or a processor. When acting as a controller, the Platform independently determines the purposes and means of the processing of personal data. At the same time, being a processor, the Platform processes personal data on behalf of the user and under its instructions.

When Platform is a data controller, the data subjects can contact Platform on any questions relating to the processing of their personal data by either of the following methods:

By e-mail: support@payri.io.

By mail: Kallipoleos, 3, Flat/Office 102, 1055, Nicosia, Cyprus.

2. Purposes and legal bases for the processing

As a controller, the Platform processes personal data to manage the provision of the services to its Users (registration/authentication, provision of access to the Platform, support and troubleshooting, billing, etc.), to comply with applicable laws, to promote the Platform services and other products, to improve the Platform services, to provide security of the Platform services, to protect its legal rights.

When doing so, Platform relies on (1) the necessity of the processing for the performance of a contract to which the data subject is party or to take steps at the request of the data subject before entering into a contract; (2) the necessity of the processing of personal data to comply with its legal obligations; (3) the necessity of the processing of personal data for the legitimate interests pursued by Platform. In some cases, the Platform relies on (4) the consent of a data subject to process his or her personal data. Please note that direct marketing communications with you shall be made only upon your prior opt-in consent, and you will have an opportunity to opt-out at any time using the "unsubscribe" button in messages you receive from us.

The legitimate interests of Platform consist of (1) compliance with applicable laws and regulations; (2) promoting the Platform services and other products (except for the cases, where consent is required); (3) improvement of the Platform services; (4) provision of security of the Platform services; (5) protection of its

legal rights. You can get more information on the legitimate interests pursued by Platform and relevant balancing tests by sending a request with the use of contact details specified in section 1 of this Privacy Policy.

3. Categories of personal data

As a controller, the Platform processes personal data related to its Users (individuals or representatives of legal entities), who use the Platform. Categories of processed personal data include:

1. **Personal data collected directly from you** (the list may vary depending on the specifics of your interaction with the Platform): email, nickname, full name, surname, mobile phone, alias, residential address, country of residence, a copy of the government identity document that you provide to us, VAT number, a “selfie” of you holding your government identity document, third-party social media / personal website address, password, avatars and your headers, your subscriptions, subscribers and referrals, any personal data contained in the content, posts and comments and support requests that you have made on the Platform, personal data contained in chat messages between you and other Users, your IP-address, country and language settings, information about choices regarding marketing communications, payment data.
2. **Automatically collected personal data related to the usage of the Platform:** information about the usage of the Platform; IP address, type and device ID; Internet Service Provider (ISP), browser type and version; geographical location based on the IP address, the Platform registration and access times, statistics on page views and time spent on pages, log files generated during the usage of the service, information about the usage of the website obtained through Google Analytics or similar technologies.
3. **Personal data received from third parties:** personal data specified above if obtained from authorized third parties on an appropriate legal basis; advertising IDs, standard claims from Google or SSO provider (including Google ID, email, name, surname, middle name, picture, gender, address, birthdate, IMEI code, MAC address, etc.).

4. Recipients and sources of personal data

4.1. We disclose certain personal data to the following recipients to the extent required or permitted by applicable law and/or based on their legitimate and reasonable requests:

- Our third-party service providers: such as our IT, payment processing, customer support, content and text moderation, and age and identity verification/age estimation service providers;
- Our professional advisers: such as our legal advisors, bankers, auditors, accountants, consultants, and insurers;
- Partners otherwise assisting in the provision of our services and achievement of other purposes mentioned in section 3 of the Privacy Policy;
- Governmental and regulatory bodies, including law enforcement authorities, in connection with inquiries, proceedings or investigations by such parties or to enable the Platform to comply with its legal and regulatory requirements.

5. Transfers to third countries

We may transfer the personal data of the data subjects to third countries that do not provide the same level of data protection as in the country of your residence. When doing so, we ensure the implementation of security measures aimed at the protection of your personal data appropriately. This may include but is not limited to, entering into Standard Contractual Clauses for international data transfers in the form approved by the European Commission.

The data subjects can get more information on the mechanisms of transfers to third countries by the Platform by sending a request using contact details specified in section 1 of this Privacy Policy.

6. Storage periods

We store personal data as long as it is required to achieve the purposes of the processing specified in section 3 of this Privacy Policy unless there are specific periods defined in applicable laws.

If you wish to have any personal data removed from our databases, please contact us by sending a request with the use of contact details specified in section 1 of this Privacy Policy.

7. Basic rights of data subjects

You, in respect of their personal data, have rights to (if such rights are provided for data subjects by applicable law):

1. Access;

You can ask the Platform to confirm whether or not the Platform processes your personal data. If so, you can access these personal data and can ask the Platform to explain certain details of the processing.

2. Rectification;

You can ask the Platform to correct inaccurate personal data concerning you. If it complies with the purposes of the processing, you can ask the Platform to complete incomplete personal data.

3. Erasure ('right to be forgotten');

You can ask the Platform to erase personal data concerning you under applicable law. For example, this applies if (1) the personal data are no longer necessary to the purposes for which they were processed; (2) you withdraw consent to the processing and there is no other legal ground for the processing; (3) the personal data have been unlawfully processed.

4. Restriction on processing;

You can ask the Platform to mark the stored personal data to limit their processing in the future under applicable law. This applies if (1) you contest the accuracy of the personal data; (2) you ask to restrict the use of the personal data when their processing is unlawful; (3) you need personal data to protect your rights when the Platform no longer needs the personal data; (4) you have objected the processing based on the legitimate interests pursued by the Platform or by a third party.

5. Objection to processing (if provided to the data subjects under applicable data protection laws);

You can object, on grounds relating to a particular situation, at any time to the processing of personal data concerning you which is based on the legitimate interests pursued by the Platform or by a third party. The Platform shall no longer process the personal data unless the Platform demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of you or for the establishment, exercise or defense of legal claims.

6. Portability (if provided to the data subjects under applicable data protection laws);

When the processing is based on your consent or a contract with you, you can receive the personal data concerning you, which you have provided to the Platform, in a structured, commonly used and machine-readable format and can freely transmit those data to another service. Where technically feasible, you can also ask the Platform to transmit the personal data directly to another controller.

To exercise their rights, data subjects can contact the Platform using contact details specified in section 1 of this Privacy Policy.

8. Withdrawal of consent

Where processing is based on your consent (or explicit consent), you have the right to withdraw consent at any time. The withdrawal of consent does not affect the lawfulness of the processing based on consent before its withdrawal. We can continue to process your personal data if we have another legal basis to do so. To withdraw consent, you can contact us with the use of contact details specified in section 1 of this Privacy Policy.

9. Right to lodge a complaint with a supervisory authority

When Article 77 of the GDPR (or the relevant provision of other applicable laws) applies, you have the right to lodge a complaint with a supervisory authority in the area of data protection in the country of your residence in relation to any part of the Platform, save as expressly set out in the Terms of Service.

10. Cookies

For more information, please see our Cookie Policy

11. Children's privacy

We do not knowingly or intentionally collect personal data through our services from children under eighteen (18) years of age. If you are under eighteen (18) years of age / other age, recognized in your jurisdiction as sufficient for your use of our Platform, do not attempt to register for or use our Platform, and do not provide us any personal data about yourself unless you have the requisite parental consent. If you are a parent or guardian and you are aware that your child has violated this Privacy Policy and provided us with personal data, please contact us with the use of contact details specified in section 1 of this Privacy Policy. If we become aware that a minor has provided us with personal data or we otherwise process his/her personal data in violation of the Privacy Policy, we will take steps to remove that information.

12. Changes to this Privacy Policy

We may change this Privacy Policy from time to time at our sole discretion. If so, we may notify the data subjects about these changes by an appropriate method. If there is no explicit notification, the data subjects may always review the up-to-date version of this Privacy Policy.