

Privacy Policy

This Privacy Policy was last updated on 18 January 2023 and applies to Dexter LLC's (I/N 400325135) websites in the dexter.io domain (the "**Website**").

This Privacy Policy is a part of the Terms and Conditions located at dexter.io, and describes our policies and procedures on the collection, use and disclosure of your information when you use our Website and associated services and tells you about your privacy rights and how the law protects you.

We use your Personal Data to provide and improve our service. By visiting and using the Website and its associated products and services, you agree to the collection and use of information in accordance with this Privacy Policy.

Please review the Terms and Conditions and the foregoing Privacy Policy carefully. If you do not wish to abide by these terms you may not use the Website and associated services.

Children

The Website and its associated products and services are not intended for individuals under the age of eighteen (18), and the Company does not knowingly collect or solicit any information from anyone under the age of eighteen (18).

Terms and Definitions Used in this Privacy Policy

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

For the purposes of this Privacy Policy:

"**GDPR**" means EU Regulation 2016/679 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC.

"**CCPA**" means the California Consumer Privacy Act of 2018.

"**Company**" referred to as either "the Company", "we", "us" or "our" in this Agreement, refers to Dexter LLC. For the purpose of GDPR and Law of Georgia on Personal Data Protection, the Company is the Data Controller.

"**Consumer**", for the purpose of CCPA, means a natural person who is a California resident. A resident, as defined in the law, includes (1) every individual who is in the USA for other than a temporary or transitory purpose, and (2) every individual who is domiciled in the USA, who is outside the USA for a temporary or transitory purpose.

"**Cookies**" are small files that are placed on your computer, mobile device or any other device by the Website, containing the details of your browsing history on that Website among its many uses.

"Data Controller", for the purposes of the GDPR and Law of Georgia on Personal Data Protection, refers to the Company as the legal person which alone or jointly with others determines the purposes and means of the processing of Personal Data.

"Device" means any device that can access the service such as a computer, a cell phone or a digital tablet.

"Do Not Track (DNT)" is a concept that has been promoted by US regulatory authorities, in particular the U.S. Federal Trade Commission (FTC), for the Internet industry to develop and implement a mechanism for allowing internet Users to control the tracking of their online activities across Websites.

"Personal Data" is any information that relates to an identified or identifiable individual. For the purposes of GDPR, Personal Data means any information relating to you such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity. For the purposes of CCPA, Personal Data means any information that identifies, relates to, describes or is capable of being associated with, or could reasonably be linked, directly or indirectly, with you. And for the purposes of Law of Georgia on Personal Data Protection, Personal Data means any information connected to an identified or identifiable natural person. A person shall be identifiable when he/she/they may be identified directly or indirectly, in particular by an identification number or by any physical, physiological, psychological, economic, cultural or social features specific to this person.

"Sale" means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a Consumer's personal information to another business or a third party for monetary or other valuable consideration.

"Service" collectively refers to the Website and the services offered by Company through the Website.

"Service Provider" means any natural or legal person who processes the data on behalf of the Company as Data Controller. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used. For the purpose of GDPR, Service Providers are considered Data Processors.

"Usage Data" refers to data collected automatically, either generated by the use of the service or from the service infrastructure itself (for example, the duration of a page visit).

"Special Categories of Data" refers to data connected to a person's racial or ethnic origin, political views, religious or philosophical beliefs, membership of professional organisations, state of health, sexual life, criminal history, administrative detention, putting a person under restraint, plea bargains, abatement, recognition as a victim of crime or as a person affected, also biometric and genetic data that allow to identify a natural person by the above features.

"Direct marketing" refers to offering goods, services, employment or temporary jobs by mail, telephone calls, e-mail or other means of telecommunication.

"you" means the individual accessing or using the Website and its associated Services, or other legal entity on behalf of which such individual is accessing or using the Website and its associated Services, as applicable. Under GDPR and Law of Georgia on Personal Data Protection, you can be referred to as the Data Subject.

Personal Data Collected

While using our service, we may ask you to provide us with certain Personal Data that can be used to contact or identify you. Such Personal Data may include:

If you send us notification through “Contact” section of our website - we may process your first name, last name, name of the company you represent (if any), e-mail address, phone number, address - state, province, ZIP/postal code, city and information provided by you in the text section.

If you visit and/or use the Website - Certain information may be collected automatically, such as the Internet protocol (IP) address of your computer, name of the domain and host from which you access the Internet, the browser software and operating system of your computer, and the Internet address of the website from which you linked directly to our Website.

If you contact us via our email - we may process your email address and any data that you submit while communicating.

If you are a user of any of our Services - we may also collect data for the purpose of agreement performance, pricing, your age, full name, address, email, and other information related to your agreement history.

For specific activities, services or software, we may collect other types of information and use such information for different purposes than described in this Privacy Policy. We inform you about this when you apply for the specific service, engage in specific engagement with us or use the specific software.

Do Not Track

Generally, we do not track you over time and across third party websites to provide targeted advertising and therefore we do not respond to Do Not Track (DNT) signals.

Usage Data

Usage Data may be collected automatically when using the service.

Usage Data may include information such as your Device's Internet Protocol address (IP address), browser type, browser version, the pages of our service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the service by or through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

We may also collect information that your browser sends whenever you visit our Website or when you access the service by or through a mobile device.

Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on our Website and store certain information. Tracking technologies Used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service. The technologies we use may include:

- **Cookies or Browser Cookies.** A cookie is a small file placed on your Device. you can instruct your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if you do not accept Cookies, you may not be able to use some parts of our Service. Unless you have adjusted your browser setting so that it will refuse Cookies, our service may use Cookies.
- **Web Beacons.** Certain sections of our service and our emails may contain small electronic files known as Web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related Website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on your personal computer or mobile device when you go offline, while Session Cookies are deleted as soon as you close your Web browser.

We may use both Session and Persistent Cookies for the purposes set out below:

- **Necessary / Essential Cookies**

Type: Session Cookies

Administered by: us

Purpose: These Cookies are essential to provide you with services available through the Website and to enable you to use some of its features. They help to authenticate Users and prevent fraudulent use of user accounts. Without these Cookies, the services that you have asked for cannot be provided, and we only use these Cookies to provide you with those services.

- **Cookies Policy / Notice Acceptance Cookies**

Type: Persistent Cookies

Administered by: us

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

- **Functionality Cookies**

Type: Persistent Cookies

Administered by: us

Purpose: These Cookies allow us to remember choices you make when you use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you use the Website.

- **Tracking and Performance Cookies**

Type: Persistent Cookies

Administered by: Third-Parties

Purpose: These Cookies are used to track information about traffic to the Website and how users use the Website. The information gathered via these Cookies may directly or indirectly identify you as an individual visitor. This is because the information collected is typically linked to a pseudonymous identifier associated with the device you use to access the Website. We may also use these Cookies to test new pages, features or new functionality of the Website to see how our users react to them.

Source of Personal Data we Process

Generally, the Personal Data we process is obtained directly from you. However, there are situations in which we may also be in possession of your Personal Data through other legitimate means, such as executing an agreement to which you are not a party:

- If you are designated as an authorized person or business contact for our partners.
- If we provide you with our Services.
- If you are our employee.
- If you allow recruitment platforms to share your CV or resume with us.
- Depending on your social network settings, we may receive information from your social network. For example, when you follow us via social media platforms, such as LinkedIn and Facebook, we can receive Personal Data from these social media platforms related to your profile.

We do not process any Special Categories of Data.

Use of your Personal Data

The Company may use Personal Data for the following purposes:

- To provide and maintain our service, including to monitor the usage of our service.
- To manage your Account (if any): to manage your registration as a user of the service. The Personal Data you provide can give you access to different functionalities of the Service that are available to you as a registered user.
- For the performance of a contract: the development, compliance and undertaking of the purchase contract for the products, items or services you have purchased or of any other contract with us through the service.
- To contact you: To contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.

- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information.
- To manage your requests: to attend and manage your requests to us.
- For business transfers: we may use your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by us about our Service users is among the assets transferred.
- For other purposes: we may use your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our service, products, services, marketing and your experience, monitor aggregate metrics such as total number of visitors, traffic, and demographic patterns, comply with legal obligations and legal process, respond to requests from public and government authorities, including public and government authorities outside your country of residence, and protect our operations.

Retention of your Personal Data

The Company will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. we will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies. we will delete your personal information as soon as it is no longer needed for the specific purpose.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our service, or we are legally obligated to retain this data for longer time periods.

Disclosure of your Personal Data

There is not any Sale of your Personal Data by us. We do not sell or share your Personal Data with anyone outside the Company. However, we may disclose or share data with the following categories of recipients for the following purposes:

- Support services - we may use third parties for support services to the Website, such as social network providers, marketing agencies and IT suppliers. All such third parties may require to protect your Personal Data and only process it as per our instructions.
- Third-party websites - our Website may contain links to third-party websites; if you follow these links, you exit our Website. While these third-party websites are selected with care, we cannot accept liability for the use of your Personal Data by these third parties.
- Public authorities - if we are required to by law, court order or any other order of public authorities, we may share your Personal Data with public authorities or governmental organizations.
- Sharing with affiliate companies and ownership change of Company - we may share your Personal Data with our affiliate company if this is necessary for the purposes listed above. If ownership of

Company changes as a result of a merger, acquisition, transfer, sale of assets, reorganization or bankruptcy your Personal Data may be transferred to the successor entity.

- Researches - for research purposes we may use third party software such as Google Analytics.
- With your consent, we may disclose your Personal Data for any other purpose.

Legal Basis of Processing

We collect, use and store your Personal Data to comply with the legal obligations we are subject to, if necessary for our legitimate interests or the interests of a third party, for the execution of an agreement, or on the basis of your consent.

When we process your Personal Data for our legitimate interests or the interests of a third party, we have balanced these interests against your legitimate interests. Where necessary we have taken appropriate measures to limit implications and prevent unwarranted harm to you. our legitimate interests may, for example, include security and safety purposes, to improve our Website, or to provide better services and offers to you.

Where we process your Personal Data for a purpose other than that for which we collected it initially (and we rely on a legal basis other than consent or complying with legal obligations for this new purpose), we will ascertain whether processing for this new purpose is compatible with the purpose for which the Personal Data were initially collected.

The specific legal basis of processing your Personal Data are:

- Making steps at your request before concluding an agreement (Article 6 (1) (b), of GDPR)
- The fulfillment of legal obligations by us (Article 6 (1) (c) of GDPR).
- The legitimate interest of us (Article 6 (1) (f) of GDPR), such as: the organization of the entire Company activity for the purpose of carrying out the activity; scheduling of IT applications; solving complaints and requests received from clients or other interested persons; initiating and conducting litigation by courts of law and (possibly) other public authorities.
- Your consent to processing, when expressly granted, freely and unconditionally, in specific situations such as, for example, marketing processing (Article 6 (1) (a) of GDPR).

Personal Data Transfers to Third Countries

The Company may transfer your Personal Data to countries other than your country of residence, including but not limited to countries outside the European Economic Area. International transferring occurs in the course of providing your services. Partners or Service Providers may have operations in countries across the world. The laws of these countries may not afford the same level of protection to your Personal Data.

Company ensures that proper and required protection is in place to comply with the requirements for the international transfer of Personal Data under applicable privacy laws. For transfers of Personal Data outside Georgia, or the European Economic Area, Company may use European Commission approved Standard Contractual Clauses as safeguards.

Data Security

Company ensures that your Personal Data is properly secured by appropriate technical and organizational measures, so that they are protected against unauthorized or unlawful use, alteration, unauthorized access or disclosure, accidental or wrongful destruction, and loss. However, no security system is impenetrable and Company cannot guarantee the security of the systems. In the event that any information is compromised as a result of a breach of security, the Company will take steps to investigate the situation and, where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

Your Rights

You may contact us (please see Clause “How to contact us” below) to exercise any of the rights you are granted under applicable data protection laws, which includes the following:

Right to access - you may ask us whether or not we process any of your Personal Data and, if so, receive access to that Personal Data in the form of a copy. When complying with an access request, we will provide you with additional information necessary for you to exercise the essence of this right. You also have the right to request that the Company disclose what Personal Data it collects, uses, discloses, and sells; and the right, at any time, to direct the Company if it sells your Personal Data to third parties not to sell your Personal Data (“right to opt-out”).

Right to rectification - you may have your Personal Data rectified in case of inaccuracy or incompleteness. Upon request, we will correct inaccurate Personal Data about you and, taking into account the purposes of the processing, complete incomplete Personal Data, which may include the provision of a supplementary statement.

Right to restriction of processing - you may obtain a restriction of the processing of your Personal Data, which means that we suspend the processing of your data for a certain period of time. Circumstances which may give rise to this right include situations where the accuracy of your Personal Data was contested but some time is needed for us to verify their (in)accuracy. This right does not prevent us from continuing storing your Personal Data. we will inform you before the restriction is lifted.

Right to erasure - you may have your Personal Data erased, which means the deletion of your data by us and, where possible, by any other controller to whom your data has previously been made public by us. Erasure of your Personal Data only finds a place in certain cases, prescribed by law and listed under article 17 of the GDPR. Due to the way we maintain certain services, it may take some time before backup copies are erased.

Right to data portability - you may request us to provide you with your Personal Data in a structured, commonly used and machine-readable format and to have such data transmitted directly to another controller, where technically feasible. Upon request and where this is technically feasible, we will transmit your Personal Data directly to the other controller.

Right to object - you may object to the processing of your Personal Data, which means you may request us to no longer process your Personal Data. This only applies in case the ‘legitimate interests’ ground constitutes the legal basis for processing (Clause “Legal Basis of Processing” above).

Opt-Out for Direct Marketing - you may opt out at any time from the use of your Personal Data for direct marketing purposes by contacting us. In such case, we will cease processing your Personal data within 10 (ten) working days from the receipt of your notice thereof. With your Consent, we may send promotional and non-promotional push notifications or alerts to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

Refusal of consent - you may, at any time, without explanation, to refuse the consent given by you to us and to request the termination of the processing and/or the destruction of the Personal Data collected by us. We will stop the data processing and/or destroy the processed data in accordance with your request within 5 days from the submission of your notice, if there is no other basis for data processing. The effect of the foregoing does not apply to the information processed about the fulfillment of your monetary obligations with your own consent.

Right of appeal - you may apply to the Personal Data Protection Service or the court in case of violation of your rights provided by applicable law.

At your request, we will correct, update, add, block, delete or destroy the data if they are incomplete, inaccurate, not updated or if their collection and processing was carried out without compliance with applicable laws. The decision to block the data is made within 3 days after the submission of the relevant request and is valid until the decision to correct, update, add, delete and destroy the data by us.

You may exercise any of the above rights without fear of being discriminated against. Under conditions, we are entitled to deny or restrict your rights as described above. In any case, we will carefully assess whether such an exemption applies and inform you accordingly.

We will use the information you provide to make your rights requests to verify your identity, identify the Personal Data we may hold about you and act upon your request. You are required to verify your email in order for us to proceed with your rights requests.

We may, for example, deny your request for access when necessary to protect the rights and freedoms of other individuals or refuse to delete your Personal Data in case the processing of such data is necessary for compliance with legal obligations.

Unless otherwise specified herein, we will work to respond to your valid request within 10 (ten) business days of receipt.

How to Contact us

If you have any questions or concerns, or need to exercise your rights listed above, you can contact us via email directed to office@dexer.io

If you have unresolved concerns, you also have the right to contact the data protection authorities.

Amendment to Privacy Policy

We may update and/or change the terms of this Privacy Policy, thus, we encourage you to review this Privacy Policy from time to time for the latest information and terms. you can always check the “last updated” date at the top of this document to see when the Privacy Policy was last amended.

Consent

When negotiating or/and entering into an agreement with Company, using Services, or visiting our Website, or sending us notification, you implicitly acknowledge that you have read, and agree with this Privacy Policy and you hereby consent to our collection, use, management, retention, and disclosure of your information as described herein.