

## **Personal Data Security Statement**

### **of Tech Ventures International Limited Company**

### **concerning the use of Mawadoo Internet Platform**

Tech Ventures International Limited Company, [Tech Ventures International Ltd., Tech Ventures International Ltd., P O Box 93915, Dubai, United Arab Emirates] (hereinafter referred to as “**TVIL**” company) among other matters, manages Mawadoo Online Shop on [www.mawadoo.com](http://www.mawadoo.com) Website (including Toplevel domains), it uses for purchasing goods of all kinds from Sellers on its own behalf and at its own expense, and sells the goods to Final Buyers.

As a Seller, you may post some goods you would like to sell to TVIL Company on the Internet Platform, providing some data of the goods, and sell it to TVIL Company. Moreover, you may order translation of your goods' descriptions into other languages or rent advertising space on the Internet Platform.

As a Final Buyer, you may purchase goods, and, in some cases, you may also choose from which supplier of TVIL Company the goods shall be purchased.

The use of Mawadoo Internet Platform requires compulsory personal data exchange. Concerning the offers, the subject matter is also the data you post on the Website on your own as a Seller, offering goods or using advertising space, and make available to other visitors of the portal.

TVIL Company assigns high priority to following the Provisions of the Federal Data Protection Act, as well as the Electronic Media Act. TVIL Company collects and processes your personal data only to the extent stipulated by the present Personal Data Security Statement. Below you shall find a detailed description of the purpose and extent of collection, processing and use of the personal data.

**Pursuant to Federal Data Protection Act, due to your registration on Mawadoo portal we request your consent to the collection, processing and use of your personal data. By clicking on the corresponding button, you confirm your consent to our collecting, processing and using your personal data to the extent described in the present Statement.**

**You may cancel your consent anytime.** To do so, you need to send a message to the e-mail address [office@mawadoo.com](mailto:office@mawadoo.com). For sure, you may also contact us in writing by sending a letter to the address: Tech Ventures International Limited, [P O Box 93915, Dubai, United Arab Emirates]. Please notice that in the event of cancellation of your consent to the collection, processing and using your personal data, according to the Personal Data Protection Act, under certain circumstances you shall not be able to use some services and functions of Mawadoo portal. You may download the Personal Data Security Statement in PDF format at [http://www.mawadoo.com/download/privacy/privacy\\_de.pdf](http://www.mawadoo.com/download/privacy/privacy_de.pdf).

#### **1. Type and volume of personal data collection and processing**

We collect and process personal data as so-called “Basic data” if you register on the Internet Platform as a Seller or a Buyer of goods, post offers or execute a Purchase and Sale Agreement. Moreover, to a certain extent we save and use data as so-called “Website use data” we receive in the process of use of our Internet Platform. Of course, it is done anonymously or under nicknames. Moreover, we save the data you provide after registration as you offer goods or rent advertising space in electronic form on our servers, for the potential Buyers to download them on the Internet Platform within the limits established by you.

##### **a) Basic data**

Collecting, saving and using Basic data, we differentiate between your registration on Mawadoo Internet Platform as a potential Seller or a Buyer of goods:

## **aa) Basic data of Buyers**

To buy goods on our Internet Platform, you need to register on our portal. Doing so, you receive the data required for authorization and login into Mawadoo Internet Platform system. During registration we mostly request for and save the following Basic data:

- Your gender,
- Your first name and last name,
- In some cases, the title of your company and an authorized contact person, his/her first name and last name,
- Your postal address (street, building, postal code, city, country, P.O.B.),
- Date of birth,
- In some cases, additional address,
- Mobile phone number on which we send you registration confirmation code by sms,
- In some cases, additional phone numbers and fax number,
- Login and password for entering your account, and
- E-mail address.

These Basic data are required to create and administrate your account, to process your purchase offers and place possible orders, and also to contact you when needed. Apart from that, we may transfer the Basic data exclusively to our suppliers for the purpose of fulfilment of the Agreement, for example, for the Supplier to deliver the goods to you as a Final Buyer. We may also disclose your e-mail to our Supplier for them to contact you in the event of goods' return, or, if you exercise the right to cancellation of the Agreement, to perform the purchase return.

If you express your consent in a separate statement, we shall use your e-mail address also to send you our newsletter with information of new services and functions of Mawadoo Internet Platform, as well as of interesting offers. You may always unsubscribe from the newsletter by clicking the link contained in every newsletter.

During certain types of payment, you shall be readdressed to the Website of the payment system operator. Collection, processing and saving the data in such a case are performed by the payment system operator and may not be influenced by us in any way. You may find information of the use of your personal data on the operator's website.

## **bb) Basic data of Sellers**

As a Seller wishing to sell some goods to TVIL Company, you need to register on Mawadoo Internet Platform. For registration we request the following Basic Data:

- Your gender,
- Your first name and last name,
- In some cases, the title of your company and an authorized contact person, his/her first name and last name,
- Your postal address (street, building, postal code, city, country, P.O.B. or other), and in some cases, additional addresses,
- E-mail address and mobile phone number,
- In some cases, additional phone numbers and fax number,
- Login and password for entering your account,
- In some cases, extract from the Trade register and/or Company registration certificate / individual entrepreneur registration certificate or any other documents confirming the right to commercial activity,
- For private Sellers: ID, driver's license or other documents, and
- Bank details: title of the credit institution, IBAN, BIC codes, and in some cases other contact data for other payment systems (such as PayPal etc.).

We collect, process and save the mentioned Basic Data to create and manage your account, post your goods offers on Mawadoo Internet Platform, execute and fulfil your Purchase and Sale Agreements concluded with us and to effect necessary payments. We shall indicate the name of your company or your last name by the goods offer on Mawadoo Internet Platform, for potential Buyers to select the supply source where TVIL company shall purchase the goods. Apart from that, we shall disclose your Basic Data only to the Buyer who have purchased the goods from us. It only happens if it is compulsory for the execution and fulfilment of the Purchase and Sale Agreement.

During certain types of payment, you shall be readdressed to the Website of the payment system operator. Collection, processing and saving the data in such a case are performed by the payment system operator and may not be influenced by us in any way. You may find information of the use of your personal data on the operator's website.

## **b) Website use data/Pattern of use/Cookies/Social plugins**

Generally, you may visit our Websites without registration or authorization. However, as you use the website, there appear some data indicated as "Website use data". To such data, the following provisions are applicable:

### **aa) Log files**

When a registered or a regular user visits our Websites, we save some of their data in so-called log files. A log file consists of the IP address, start and finish time of browsing our pages, amount of transferred data and subpages opened by the visitor on our Website. We collect and save log files, on one hand, for the sake of security, to investigate any cases of abusing our services. On the other hand, we use this data to see how our services are used. That is how we find which pages are more popular, during which time our services are more intensively used, how the website is navigated etc. We use the results for technical optimization of our services and editing the website. It means, for instance, that we do not know what user behaviour you prefer; we only know that there is a user with a certain pattern of behaviour. We have no capacity and no interest to identify you as a person using your IP address.

We also use your IP address to see which country you are from. It is done for automatic offering Websites in the language of your country, for the change of goods range and for offering the goods which may be sent to your country.

### **bb) Google Analytics service**

We retain the right to use Google Analytics on our Website, i.e. to use the web analytics service provided by Google Inc. located at: 1600 Amphitheatre Parkway, Mountain View, CA 94043, U.S.A. ("Google"). Google Analytics services uses the so-called Cookies, i.e. text files saved on your computer for the analysis of the Website use (find more information on Cookies in paragraph ff). The information concerning the Website use, collected with Cookies (including your IP address) shall be transferred to the service of Google in USA and saved there.

Google uses this information to analyse the way you use the Website, to compile reports on your activity on the website and render some more services connected with the use of the Website or the Internet. Moreover, in some cases Google may transfer these data to the third parties, should it be prescribed by law or should such third people process the data following the order of Google. Google shall never associate your IP address with other data possessed by Google.

Apart from that, we expand Google Analytics service by means of a so-called anonymizer. Thus, the last figures of your IP address shall be "blackened" to make identification impossible.

You may prevent registration and processing of data collected with Google Cookie if you download and install the following browser plugin: <http://tools.google.com/dlpage/gaoptout?hl=de>.

### **cc) Google +1 button**

In some cases, our website uses the screen button "+1" of Google Plus social network by Google Inc. (see address in the previous paragraph bb). You shall recognize the button with the "+1" symbol on a white or coloured background.

If you open one of our websites with such a button, your browser makes connection with Google servers. Google directly transfers the button contents to your browser and connects the data with the website. We make no influence on the data Google receives from you in this process. Google informs us of which of our Web pages you have visited. However, "+1" button is not used to keep record of your web visits in general. Reading "+1" screen button, Google does not keep record of your browser history on a permanent basis and does not analyse your visiting other pages in any other way by means of "+1" button. Google keeps data of your visits for the system maintenance and for elimination of errors for approximately two weeks. These data are not structured by either individual profiles or user names, or by Uniform Resource Locators (URLs), and are not transferred to us. If you log in Google+ and click on "+1" button, Google shall register your profile information in Google, the Uniform Resource Locator (URL) recommended to you, your IP address and other data connected with the browser. These data shall be deleted as soon as you terminate your Google+ membership. If you make your profile public by using Google+ settings, your "+1" symbols will be shown by Google as links to your account name and your account picture in Google services, as well as in search results or in your Google profile, or on other websites and notes in the Internet. Find more information concerning the purpose, amount of collected data and their further use in Google in Google Confidentiality Statement <http://www.google.com/intl/de/+policy/+1button.html>.

If as a Google+ member you would like to avoid Google's collecting and processing your Website visit data, you need to logout from Google Plus before each visit to our Internet Platform.

### **dd) Facebook button**

Our Website also uses plugins of facebook.com social network (e.g., "Like" button) belonging to Facebook Inc. registered at the following address: 1601 S. California Ave, Palo Alto, CA 94304, USA. Our Websites have the mentioned button. If you open our Websites with one of such plugins, your browser makes a direct connection with Facebook servers. The plugin content is directly transferred to Facebook Inc., to your browser, and, therefore, our Website is displayed; at the same time, we cannot make effect on the detailed content of the plugin.

Facebook Inc. may use the Website use data transferred to Facebook Inc. servers to make conclusion concerning which of the Websites you have used and to add the data into your Facebook account if you are registered on Facebook, or recently visited Facebook or other pages with Facebook content. If you are an active user of Facebook plugins (e.g., "Like" button), the data are transferred to Facebook Inc. directly by your browser, and we cannot make any considerable effect on that. Find more details concerning the form and amount in which Facebook Inc. collects, processes and uses the mentioned data in Confidentiality Policy of Facebook Inc. at [www.facebook.com/policy.php](http://www.facebook.com/policy.php). There you can also find information on how you can protect your privacy.

To avoid collection of your data by Facebook Inc. during visits to our Websites, before visiting the Websites you can logout from Facebook and, if possible, delete the existing Cookies of Facebook Inc. from your browser.

### **ee) Twitter**

On our Websites we also use plugins of short character message service Twitter Inc. registered at the following address: 795 Folsom St., Suite 600, San Francisco, CA 94107, USA, (so-called "Tweet" button). If you visit our Websites via "Tweet" button, by using the plugin the direct connection between your browser and Twitter service is made. This way Twitter collects information about your visiting our page from your IP address, and in some cases may identify this information with your Twitter account. If you logged in your Twitter account and clicked on "Tweet" on our Website, you may directly connect your Twitter profile with the content of our Websites. Therefore, Twitter may correlate the visit to our pages to your user profile. We make no effect on the transfer and processing of these data by Twitter company. Find more information in Twitter Privacy Policy at: <http://twitter.com/privacy>.

To avoid identification of your visiting our websites with your Twitter account, you should logout from Twitter before visiting our Internet Platform.

**You may announce your objection to the collection, processing and use of the data mentioned in paragraphs 1. b) from aa) to ff) anytime.**

#### **ff) vkontakte.ru plugin (“Like” button)**

On our Websites we use plugins of vkontakte.ru social network, registered at the following address: No.8 bldg. B, Tverskaya St., 191015 Saint Petersburg, Russia. You can recognize the so-called Odnoklassniki plugin by “B” logo or “Like” button on the Website. If you visit our pages through this plugin, a connection between your browser and vkontakte.ru server is established. Therefore, vkontakte.ru receives information that you visited our Website from your IP address. If you actively use “Like” button in vkontakte.ru, logged in your vkontakte.ru account, you may directly connect the content of our Websites to your vkontakte.ru profile. In this case, vkontakte.ru may also correlate your visit to our pages with your account. We do not have accurate information on the content of the transferred data or the way they are used by vkontakte.ru social network. To avoid the mentioned identification of your vkontakte.ru user account, before using the Websites you should log out from your vkontakte.ru account. You may find more information on the issue on vkontakte.ru Privacy Policy at: <http://vk.com/privacy>.

#### **gg) Cookies**

We also use Cookies files on our Websites. Therefore, we collect all data of the login, information on your browser type and its version, date and time of your Website visit and Cookie file number. Due to such use of Cookies within the framework of your registration (if necessary, see above), as well as during your further browse of our services, we may recognize you if you ever visit our Internet Platform after one session. You may find more details in the separate Cookies Use Statement.

**Cookies are used only if you give consent to their use during our first Website visit. Having given the consent, you may block the use of Cookies (also with regard to the paragraphs from bb) to ff) by doing the appropriate settings in your browser. To see how to do it in your browser you may use “Help” function of your browser or contact its producer. However, the security and convenience of using our Websites is only guaranteed with the use of Cookies.**

#### **c) Contents**

As a Seller of goods on our Internet platform, you may, in particular, upload descriptive texts, goods data, images and other content to the Internet Platform. We shall save these data to keep them ready for possible download for offering the goods online; should you indicate your personal data within the offer, we shall save them too. Only you may decide what personal information you would like to disclose.

When the Internet Platform Use Agreement expires, your account is deactivated and your personal data are deleted.

## **2. Transfer of data to third parties / Public access to the Website contents**

### **a) Transfer of data**

We transfer your personal data to third parties only in the following cases:

- if and to the extent it is necessary to fulfil the obligations under the agreement executed with you or to exercise our requests and rights,
- if the reason is an inquiry of any administrative bodies, particularly, law enforcement and supervision bodies, and if the data transfer is required for the protection of public security and order, or for criminal investigation, and/or
- we are obliged to do so according to the law.

## **b) Public availability of the Website contents**

We transfer the data uploaded by you to our servers for future download to the public within the framework of goods offer, making them available for all Internet users on Mawadoo Internet Platform.

## **3. Links to other Websites**

Our Website contains links to other suppliers of goods and services not related to us. As soon as you click on those links, we make no effect on the processing of the personal data which may be transferred to any third parties as you click on the link (e.g. processing of the IP address or the Uniform Resource Locator where the link is located). We bear no responsibility for the processing of such personal data by any third parties.

## **4. Provision of information, amendments, deleting, blocking**

Upon your written or electronic inquiry, we shall anytime provide you with information on which of your personal data we possess. You may also anytime demand blocking or deleting of your data. However, the data we require to fulfil the unperformed tasks or to exercise our requests or rights may not be deleted, as well as the data we are obliged to keep under legal regulations.

## **5. Security**

We take technical and organizational measures to ensure security, to guarantee protection of your personal data of loss, unauthorized corrections or access of third parties. In every case your personal data may only be accessed by authorized persons to the extent required for the achievement of the purposes mentioned above.

## **6. Data saving and transfer of data to foreign countries**

**We draw your attention to the fact that our servers are found not only in the territory of the Federal Republic of Germany, but also in other countries. You thereby give your consent to the collection, processing and use of your data outside Germany and the European Union, provided that the places of such data transfer provide the security level conforming to the Provisions of the Federal Data Protection Act and. the Electronic Media Act**

### **Contact person:**

Tech Ventures International Ltd.  
P O Box 93915, Dubai  
United Arab Emirates

**Liabile institution under Federal Data Protection Act: Tech Ventures International Limited, Dubai.**

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