

MW Advising Privacy Notice

Introduction



What this section is about: who we are, basic notions used throughout the notice, when this privacy notice activates and data processing takes place

This Privacy Notice (hereinafter - the “**Privacy Notice**”) governs relationships between **MW Advising LLC**, entity ID M104573, a company registered under the laws of the State of Wisconsin – the “**Company**” or “**We**”, “**Our**”, “**Us**” and its Customers and website visitors – the “**Data Subjects**” or the “**Data Subject**”, or “**You**”, “**Your**”,

in connection with the processing of the Data Subjects’ personal data obtained in the course of:

- (1) requesting and using the Company’s career coaching and business development services (the “**Services**”);
- (2) accessing and browsing the Company’s website at: <https://www.mwadvising.com> (the “**Landing**”); or
- (3) in any other manner and as part of other activities and services later offered, developed, and launched by the Company.

“**General Data Protection Regulation**” or the “**GDPR**” shall mean the Regulation of the European Parliament and of the Council (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation). For the purpose of Our personal data compliance, the UK equivalent of GDPR and privacy laws of other EU countries which are not parties of the EEA, shall also be included into the GDPR scope and the Data Subjects from these countries will be treated as those from the GDPR zone.

“**Personal data**”, “**processing**”, “**controller**”, “**processor**”, “**pseudonymisation**”, “**profiling**”, “**restriction of processing**”, “**consent**” and other definitions if used in the Privacy Notice shall be given the meanings under the GDPR.

“Customer”, **“Business Coach”** shall be ascribed the meanings given to them by the Terms of Service.

“Landing Visitor” shall be the Data Subject given the meaning described throughout the Privacy Notice.



What this section is about: with user friendly approach in mind, We present You with the data flows maps in a nutshell. These maps can provide You with an understanding of what data is processed about You in every event, who can access this data, on which legal basis, for what purpose and retention period for the data

You can read about the data being collected and processed in full in the next sections below the maps

Please proceed to the next page

Data Flows Maps

Map No. 1

<p style="text-align: center;">Landing Visitor's Data the Landing Visitor may be either a first-time visitor or an existing Customer</p>					
Kind of data	Legal basis	Purpose	Recipients	Transfer	Retention
Data received automatically: IP address, geolocation, session id, device operating system, resolution, browser (useragent), preferred language, mime types, acceptable formats	Our legitimate interests	To show the webpage properly in the user's browser; prevent malicious actions of visitors, attacks, hacking	(1) Squarespace Inc.; (2) software developers, web designers, business partners and managers can access the data in the event of debugging or for the purpose of getting statistical data	USA	Till the data is necessary
Google Analytics cookies	Consent obtained via the cookie consent tool	Measurement of website performance and visits	(1) Google LLC; (2) managers, business partners and software developers	European	26 months
Full name, contact details, subject of the request	Voluntary Provision; necessity to enter into a contract; legitimate interests	To reply to requests, communicate, arrange pre-contractual negotiations and communication; prevent malicious actions	(1) Squarespace Inc.; (2) Zoom Video Communication Inc.; (3) Google LLC; (4) Dropbox Inc.; (5) Microsoft Corporation; (6) Calendly LLC; (7) business partners, managers coaches; (8) accountant, attorney,	Inside and outside of USA	Till the data is necessary

Landing Visitor's Data

the Landing Visitor may be either a first-time visitor or an existing Customer

Kind of data	Legal basis	Purpose	Recipients	Transfer	Retention
			payment provider; (9) possibly, a web designer		
LinkedIn social media features (comments, shares, likes)	Voluntary provision	Commenting on the articles and posts on the Landing, sharing and liking	(1) Squarespace Inc.; (2) LinkedIn Corporation; (3) software developers, web designers, business partners and managers can access the data in the event of debugging or for the purpose of getting statistical data of the Landing performance	Inside and outside of USA	As long as your account is open
Facebook social media features (comments, shares, likes)	Voluntary provision	Commenting on the articles and posts on the Landing, sharing and Liking	(1) Squarespace Inc.; (2) Facebook Inc.; (3) software developers, web designers, business partners and managers can access the data in the event of debugging or for the purpose of getting statistical data of the Landing performance	Inside and outside of USA	As long as your account is open and according to the Facebook Inc. policies
Twitter social media features (comments, shares, likes)	Voluntary provision	Commenting on the articles and posts on the Landing, sharing and Liking	(1) Squarespace Inc.; (2) Twitter Inc.; (3) software developers, web designers, business partners and managers can access the data in the event of debugging or for the purpose of	Inside and outside of USA	As long as your account is open and according to the Twitter Inc. policies

Landing Visitor's Data

the Landing Visitor may be either a first-time visitor or an existing Customer

Kind of data	Legal basis	Purpose	Recipients	Transfer	Retention
			getting statistical data of the Landing performance		
Reddit social media features (comments, shares, likes)	Voluntary provision	Commenting on the articles and posts on the Landing, sharing and Liking	(1) Squarespace Inc.; (2) Reddit Inc.; (3) software developers, web designers, business partners an managers can access the data in the event of debugging or for the purpose of getting statistical data of the Landing performance	Inside and outside of USA	As long as your account is oper and according to the Reddit Inc. policies
Tumblr social media features (comments, shares, likes)	Voluntary provision	Commenting on the articles and posts on the Landing, sharing and liking	(1) Squarespace Inc.; (2) Tumblr Inc.; (3) software developers, web designers, business partners an managers can access the data in the event of debugging or for the purpose of getting statistical data of the Landing performance	Inside and outside of USA	As long as your account is oper and according to the Tumblr Inc. policies
Cookie consent tool provided by Cookiebot	GDPR requiremer	Storage of the user's cookie consent choice for the Company's domain	(1) Cybot A/S; (2) software developers, web designers, business partners an managers can access the data in the event of debugging or for the purpose of getting statistical data of the Landing performance	Ireland, Dublin	1 year

Landing Visitor's Data

the Landing Visitor may be either a first-time visitor or an existing Customer

Kind of data	Legal basis	Purpose	Recipients	Transfer	Retention

Please proceed to the next page

Map No. 2

Data in Business-to-Customer Model

where You are Our direct Customer as an individual

Kind of data	Legal basis	Purpose	Recipients	Transfer	Retention
Full name, contact details, subject of the request, goals and aims pursued, plans and recommendations given by Us, any other data provided for rendering the coaching services and consultations	Necessity to enter into a contract; contract performance; legitimate interests in some instances	To address You, accept and serve Your orders, answer Your questions etc. (provide the Services)	(1) Squarespace Inc.; (2) Zoom Video Communication Inc.; (3) Google LLC; (4) Dropbox Inc.; (5) Microsoft Corporation; (6) Calendly LLC; (7) business partners, managers, coaches; (8) accountant, attorney, payment provider; (9) possibly, a web designer	USA	Till the data is necessary according to legal requirements, limitation period
Payment information and payment details	Necessity to enter into a contract; contract performance	For issuing invoices, processing payments, resolving payment requests and claims	(1) Google LLC; (2) Dropbox Inc.; (3) Microsoft Corporation; (4) business partners, managers, coaches; (5) accountant, attorney, payment provider;	USA	Till the data is necessary according to legal requirements, limitation Period
Information created as a result of using Our Services	Necessity to enter into a contract;	For serving Customers remembering preferences, creating anonymized	(1) Squarespace Inc.; (2) Zoom Video Communication Inc.; (3) Google LLC;	USA	Till the data is necessary according to legal

Data in Business-to-Customer Model

where You are Our direct Customer as an individual

Kind of data	Legal basis	Purpose	Recipients	Transfer	Retention
	contract performance	aggregated statistical data	(4) Dropbox Inc.; (5) Microsoft Corporation; (6) Calendly LLC; (7) business partners, managers, coaches; (8) accountant, attorney, payment provider; (9) possibly, a web designer		requirements, limitation period

Please proceed to the next page

Map No. 3

Data in Business-to-Business Model

where You are the Data Subject of Our Customer



Please note that in this business model, as a rule, We don't interact with You directly in respect of Your personal data protection rights if You are an employee or the like in the organization hiring Us. You should contact your data controller instead

Kind of data	Legal basis	Purpose	Recipients	Transfer	Retention
Full names, contact details of the Customer's personnel, partners etc. subject-matter of the request, goals and aims pursued, plans and recommendations given by Us and any other data required for rendering the Services (to the extent it relates to the Data Subjects)	Determined by Your data controller	Determined by Your data controller Usually, the purpose is to address You, accept and serve the Customer's orders, answer the Customer's and Your questions etc (provide the Services)	Upon Your data controller's instruction: (1) Squarespace Inc.; (2) Zoom Video Communication Inc.; (3) Google LLC; (4) Dropbox Inc.; (5) Microsoft Corporation; (6) Calendly LLC; (7) business partners, managers, coaches; (8) accountant, attorney, payment provider; (9) possibly, a web designer	USA	Determined by Your data controller
Information created as a result of using Our Services	Determined by Your data controller	Determined by Your data controller Usually, the purpose is to serve the Customers: remember preferences create anonymized	Upon Your data controller's instruction: (1) Squarespace Inc.; (2) Zoom Video Communication Inc.; (3) Google LLC;	USA	Determined by Your data controller

Data in Business-to-Business Model

where You are the Data Subject of Our Customer

! Please note that in this business model, as a rule, We don't interact with You directly in respect of Your personal data protection rights if You are an employee or the like in the organization hiring Us. You should contact your data controller instead

Kind of data	Legal basis	Purpose	Recipients	Transfer	Retention
		aggregated statistical data	(4) Dropbox Inc.; (5) Microsoft Corporation; (6) Calendly LLC; (7) business partners, managers, coaches; (8) accountant, attorney, payment provider; (9) possibly, a web designer		
Information from the Customer's representative to enter into the contract with the Company and for the Company to render the Services (full name, address, contact details, representative's role etc.)	Necessity to enter into a contract; contract performance	To process and perform the contract with a particular Customer	(1) Squarespace Inc.; (2) Zoom Video Communication Inc.; (3) Google LLC; (4) Dropbox Inc.; (5) Microsoft Corporation; (6) Calendly LLC; (7) business partners, managers, coaches; (8) accountant, attorney, payment provider; (9) possibly, a web designer	USA	Till the data is necessary according to legal requirements, limitation period

Personal Data Collected Automatically



What this section is about: We provide You with detailed clarifications as to what automatic data can be processed on the Landing

! **Note:** When You access and use the Landing You can act as a first-time random visitor with no particular purpose, or You can be an existing Customer, an employee, contractor etc. of the Customer or the Customer's representative. Please take account for the fact that We can act in different legal capacities towards You in each of these cases – either as a data controller or data processor. Depending on Our legal status, We will have different personal data obligations towards You.

! We don't intentionally collect and process the Personal data of minors (individuals who didn't attain the age of majority in their countries of residence). If You happen to be aware of such events, please report them to Us

Through the Landing We automatically receive the so-called “**user agent data**”, which can include Your IP address, geolocation, session id, device type and operating system, screen resolution, browser identifiers, preferred language, time stamp, referral source (a place from where you were redirected to the Landing) and other online identifiers which can be received via HTTP requests.

Processing of the data above is necessary for You to access and browse the Landing. This information is mandatory for accessing and browsing the Landing.

We rely on the legitimate interests as a legal basis. Purpose for processing of this data may include prevention of cyberattacks, fraud, spotting unconscientious and suspicious behavior and keeping Our Landing and software systems healthy and secure.

Personal Data Necessary to Provide the Services and Communicate with You



What this section is about: We provide You with detailed clarifications as to what personal data can be processed when accepting and performing Your orders

! **Note:** When You reach out to Us with a request which can result in prospective contract relationships, or We are in the process of negotiating and entering into the contract, or We already are rendering the Services to You, You can act as:

(1) a Customer – individual directly contracting with Us. In this case We are a data controller for You;

(2) an official representative of the Customer (organization) ordering the Services from Us. In this scenario We process Your data as a data controller;

(3) an employee, contractor, manager, consultant of the Customer (organization) ordering the Services from Us. In this case We usually process Your data as a data processor upon instructions and agreement with Your data controller.

Kinds of data which can be processed in the events mentioned above, legal bases and purposes for their processing:

- **Full name, contact details, subject of the request, goals and aims pursued by You or Your data controller, expectations towards the results, any other data provided for rendering the coaching services and consultations** are processed on the basis of entering into and performing the contract. Purpose of processing is to address You, respond to Your questions, interact with You during the coaching and consultations sessions, send You Our reports and recommendations, comments on Your business plans and activities, resolve any requests and claims, including after completion and termination of Services etc. These kinds of data are mandatory for the Services provision;
- **Payment information and payment details** (for instance, content of invoices, payment amounts, payment periods, payment methods, information about accounts, payment settlements, any indebtedness, payment claims and their resolution etc.) are processed on the basis of entering into and performing the contract. Purpose of processing is to issue invoices to You, process payments from You, resolve any payment request and claims, interact with Our payment provider and reply to its requests (whether it's a bank or any other financial institution). These kinds of data are mandatory for the Services provision;
- **Information created as result of using Our services** (this kind of personal data may relate to history and characteristics of Your particular orders, types and nature of Your requests, payment history, performance of Your organization and improvements after using Our Services, feedback about coaching approaches working best for Your individual circumstances etc. This data is processed on the basis of entering into and performing the contract.

Purpose of processing is to serve the Customers, remember preferences, create anonymized aggregated statistics. Please be assured that these kinds of data will

be used and shared outside the Company only in a completely anonymized form. If the anonymization is found to be impossible, We will ask for Your consent for sharing the data. If this data is required by virtue of any legal requests from authorities, courts and other equivalent and similar institutions under local laws, We will provide only that portion of the data which is strictly necessary to satisfy the request. These kinds of data are mandatory for the Services provision.

- **Data obtained in communication with You**, such as by using the contact form integrated into the Landing, phone numbers published on the Landing, communication tools of Our vendors, can be processed on the basis of Your voluntary provision, entering into and performing the contract, Our legitimate interests. Through these communication tools You can voluntarily provide Us with Your name, email, phone number, information about the subject of Your message or request, Your feedback, and other data which may be necessary to address Your questions and render the Services. Purpose of processing is to answer Your requests, arrange pre-contractual negotiations, communicate with You, which may be required during performance of Your orders and provision of Services. These kinds of data may be mandatory for the Services provision.
- **Use of the Social media functionality on the Landing**, mainly the sharing, commenting on and liking features supported by LinkedIn, Facebook, Twitter, Reddit and Tumblr added to the Landing. This data can be processed on the basis of Your voluntary provision, Our legitimate interests for the purpose of sharing Our articles to your media profiles, interacting with the content. Please consult privacy notices and practices of these social media platforms on what data You can share with them by using these social media buttons on the Landing. These kinds of data are not mandatory for the Services provision.
- **Information from the Customer's representative for the contract entering and performance**, such as the representative's full name, address, contact details, his or her role in contractual relationships with the Customer etc. This data is processed on the basis of entering into and performing the contract and for the purpose of conducting pre-contractual negotiations and arrangements, preparing the services agreement for execution, processing and performing the agreement, resolving any requests and claims, including after completion and termination of Services. This data is mandatory for the Services provision.

Vendors and the Personal Data Processed by Them



What this section is about: We provide You with detailed clarifications as to what vendors (processors) we engage for running the Landing, interacting with You, accepting and performing Your orders and delivering the Services to You

! **Note:** You can also consult the Cookie Notice for information on analytics, performance, statistics and other cookies set by Our cookie vendors, except those mentioned in the Privacy Notice

For running the Landing, interacting with You, holding negotiations, performing our undertakings and delivering the Services to You, We currently use the following vendors (processors):

- 1) **Squarespace Inc.** Located at: 8 Clarkson St, New York, NY 10014;
- 2) **Cybot A/S.** Located at: Havnegade 39, 1058 Copenhagen, Denmark;
- 3) **Google LLC.** Located at: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA;
- 4) **Dropbox Inc.** Located at: 1800 OWENS STREET, SUITE 200 SAN FRANCISCO CA 94158;
- 5) **Microsoft Corporation.** Located at: One Microsoft Way, Redmond, WA 98052-6399, USA;
- 6) **Calendly LLC.** Located at: BB&T Tower, 271 17th St NW, Atlanta, GA 30363;
- 7) **Zoom Video Communications Inc.** Located at: San Jose Headquarters, 55 Almaden Boulevard, Suite 400, 500, 600, San Jose, CA 95113;
- 8) **LinkedIn Corporation.** Located at: 1000 W. Maude Avenue, Sunnyvale, CA 94085, USA;
- 9) **Facebook Inc.** Located at: 1601 Willow Road, Menlo Park, CA 94025, USA;
- 10) **Twitter Inc.** Located at: 1355 Market Street Suite 900 San Francisco, CA 94103 United States;
- 11) **Reddit Inc.** Located at: 1455 Market St. in San Francisco - San Francisco Business Times;
- 12) **Tumblr, Inc.** Located at: 60 29th Street #343, San Francisco, CA 94110.

Squarespace Inc.

Squarespace Inc. features the product and infrastructure for website building and hosting which is used by Us. When You access and browse the Landing, Squarespace may receive and process:

IP addresses, preferences, web pages You visited prior to coming to the Landing or Squarespace, information about Your browser, network or device (such as browser type and version, operating system, internet service provider, preference settings, unique device IDs and language and other regional settings), information about how You interact with the Landing and Squarespace's website (such as timestamps, clicks, scrolling, browsing times, searches, transactions, referral pages, load times, and problems You may encounter, such as loading errors). Squarespace uses this data to evaluate, provide, protect or improve their services (including by developing new products and services).

Squarespace can set certain cookies to Your browser (please consult their privacy document: <https://www.squarespace.com/privacy>), most of which are necessary for the purposes indicated above.

! **Note:** Currently We don't set any analytics and performance cookies hosted by the Squarespace's properties, except the strictly necessary cookies and data received automatically depending on Your browser's settings

Squarespace transfers the data obtained and submitted through their services to their servers located in the United States. Depending on whether You engage Us in the Business-to-Customer or Business-to-Business model, We either rely on the derogation set out in Article 49(1)(b) of the GDPR, or on the standard contractual clauses adopted by the European Commission.

Cybot A/S

Cybot A/S provides a cookie consent tool called "Cookiebot" deployed on the Landing to obtain and retain Your cookie choices on Our domain.

When You submit a consent from the Landing, the following data are automatically logged at Cybot:

- Your IP number in anonymized form (last three digits are set to '0');
- the date and time of the consent;
- User agent of Your browser;
- the URL from which the consent was submitted;
- An anonymous, random and encrypted key value;
- Your consent state, serving as proof of consent.

The key and consent state are also saved in Your browser in the first party cookie "CookieConsent" so that the Landing can automatically read and respect Your consent on all subsequent page requests and Your future sessions for up to 12 months. The key

is used for proof of consent and an option to verify that the consent state stored in Your browser is unaltered compared to the original consent submitted to Cookiebot.

Information on other data which may be collected and processed by Cookiebot, may be found at: <https://www.cookiebot.com/en/privacy-policy/>,
<https://www.cookiebot.com/en/cookie-declaration/>.

All data gathered by Cybot A/S are stored in databases and file repositories hosted in an Azure data center at Cybot's cloud vendor, Microsoft Ireland Operations Ltd in Dublin.


Google LLC

Products provided by Google LLC and used either on the Landing or as part of Our Services, currently comprise:

- **G Suite;**
- **Gmail service; and**
- **Google Analytics.**

We use G Suite and the products and services offered by this software solution, such Google docs, Google sheets, Google presentations and others, to document communication with You, pre-contractual and contractual arrangements, subject of Your orders, Our deliverables (Our programs and action plans on improving and facilitating processes in Your organization, employee and management training programs and recommendations), Your feedback, recommendations after the coaching and consulting sessions. In other words, We use G Suite for any document and information workflows connected with the Landing and Services.

Gmail service is used for official corporate messaging with Our existing and prospective Customers, or the Landing Visitors. Gmail can be utilized for sending You Our business proposals and offers, issuing invoices, delivering Our programs and action plans on improving and facilitating Your organization, employee and management training programs and recommendations etc.

 **Note:** For information collected by Google Analytics, please look up the Cookie Notice.

Please see Google LLC privacy policy setting out which personal data can be collected and processed by Google LLC in connection with the Landing and Our Services:
<https://policies.google.com/privacy?hl=en-US>.

Google LLC transfers the data obtained and submitted through their services to their servers located in the United States. Depending on whether You engage Us in the Business-to-Customer or Business-to-Business model, We either rely on the derogation

set out in Article 49(1)(b) of the GDPR, or on the standard contractual clauses adopted by the European Commission.

Dropbox Inc.

Dropbox Inc. features the Dropbox product for storing, processing, sharing and collaboratively working with documents and other files. We use Dropbox as a replacement or an equivalent to G Suite by Google LLC with the same purpose as G Suite.

Please consult the Dropbox privacy notice for more information on which data is collected and processed by this company: <https://www.dropbox.com/privacy>.

Dropbox Inc. may transfer the data obtained and submitted through the Dropbox product to their group of companies and servers located inside and outside of the United States. Depending on whether You engage Us in the Business-to-Customer or Business-to-Business model, We either rely on the derogation set out in Article 49(1)(b) of the GDPR, or on the standard contractual clauses adopted by the European Commission.

Microsoft Corporation

Microsoft Office 365 applications, such as Microsoft Office package, are used by Us as an offline tool to document and fix communication with You, pre-contractual and contractual arrangements, subject of Your orders, Our deliverables (Our programs and action plans on improving and facilitating processes in Your organization, employee and management training programs and recommendations), Your feedback, recommendations after the coaching and consulting sessions. In other words, We use Microsoft Office 365 applications for offline document and information workflows connected with the Landing and Services.

Please consult the Microsoft privacy notice for more information on which data is collected and processed by this company: <https://privacy.microsoft.com/en-us/privacystatement>.

Microsoft Corporation may transfer the data obtained and submitted through the Microsoft Office 365 applications to their servers located inside and outside of the United States. Depending on whether You engage Us in the Business-to-Customer or Business-to-Business model, We either rely on the derogation set out in Article 49(1)(b) of the GDPR, or on the standard contractual clauses adopted by the European Commission.

Calendly LLC

Calendly LLC provides the application and service called “Calendly” which is designed for scheduling and holding online calls, with or without video feature.

When You use Calendly, their servers automatically record information (“log data”), including information that Your browser sends whenever You visit their Website or the Calendly application. This log data may include the web address You came from, Your

device model, operating system, browser type, unique device identifier, IP address, mobile network carrier, and time zone or location. Whether Calendly collects some or all of this information often depends on what type of device You are using and its settings. For example, different types of information are available depending on whether You are using a Mac or PC, or an iPhone or an Android phone. To learn more about what information Your device makes available to Calendly, please check the policies of Your device manufacturer or software provider.

Calendly can obtain from You, as a Calendly invitee, certain information. This can include names, email addresses, and phone numbers; email addresses of other people; the subject of the meeting; and any other information provided to them or as required by the Calendly user (Us) upon scheduling, pursuant to the Calendly Terms of Use. Terms of Calendly may require that You register as a Calendly user to attend the meeting (call) on which You were invited by Us.

Calendly LLC may transfer the data obtained and submitted through the Calendly product and properties to their servers located inside and outside of the United States. Depending on whether You engage Us in the Business-to-Customer or Business-to-Business model, We either rely on the derogation set out in Article 49(1)(b) of the GDPR, or on the standard contractual clauses adopted by the European Commission.

Zoom Video Communications Inc.

We use the video conferencing tool supplied by Zoom Video Communications Inc. to make calls and hold electronic meetings, with or without video, with You.

In connection with use of their product Zoom collects and process certain persistent identifiers and may set technical cookies for running their service. According to the Zoom privacy and cookie notices, they can collect and process:

Persistent Identifiers:

- Internet protocol (IP) addresses,
- Browser type,
- Internet service provider (ISP),
- Referrer URL,
- Exit pages, the files viewed on our marketing sites (e.g., HTML pages, graphics, etc.),
- Operating system, and
- Date/time stamp
- Approximate location (e.g., nearest city or town) Please see their [Cookie Policy](#) for more detail.

For EU member state customers, Zoom has implemented “zero-load” cookies, which means that cookies will not be put onto a browser of such Data Subjects until after preferences have been set. Data Subjects that are detected via IP address as coming

from a EU member state, upon their first visit to the zoom.us website, will be presented with a cookie-pop up box that allows cookie preferences to be set. These cookie preferences can also be changed at any time in the future by visiting the cookie preferences link at the footer of any page on our website (only visible to visitors with EU IP addresses). Please see more at: <https://zoom.us/gdpr>.

Zoom Video Communications Inc. may transfer the data obtained and submitted through the Zoom product and properties to their servers located inside and outside of the United States. Depending on whether You engage Us in the Business-to-Customer or Business-to-Business model, We either rely on the derogation set out in Article 49(1)(b) of the GDPR, or on the standard contractual clauses adopted by the European Commission.

**Social Media Features of:
LinkedIn Corporation, Facebook Inc,
Twitter Inc., Reddit Inc., and Tumblr Inc.**

You can use this social media functionality integrated into the Landing for the sharing, commenting on and liking Our articles and posts published in the blog section of the Landing. Please consult privacy notices and practices of these social media platforms on what data You can share with them by using these social media buttons on the Landing. These kinds of data are not mandatory for the Services provision.

Recipients of Your Personal Data and Data Transfer



What this section is about: We provide You with explanations as to who We may share Your personal data with, on top of the vendors (processors) covered in in the previous section, and on which terms We share and transfer that data

For running and technically supporting the Landing, interacting with and providing the Services to You, supporting Our other internal operations and activities, We can share Your personal data with the following categories of recipients:

- Business coaches, consultants, advisors and partners who may process and fulfill your orders and requests, provide accounting services, software development, web design and other support services;
- Owners, founders, directors and other officers of the Company, successors, new owners, investors of the Company;

- Providers (vendors) supplying hosting and cloud services, online work tools for collaborative activities, cookie setting and other capabilities to operate the Landing and maintain our Services;
- Governmental authorities, authorities supervising personal data processing activities, courts, upon their official requests and regulations. In such events, the Company will strive to disclose only a part of the personal data, which is strictly necessary to satisfy their requests and regulations;
- Any other third parties, following Your explicit request and as long as it doesn't infringe Our obligations under the GDPR.

Rendering the Services, operating, running and maintaining the Landing usually will involve a regular and permanent transfer of Your Personal data to the United States and probably other third countries not ensuring an adequate level of data protection.

Transfer to a third country shall be made subject to appropriate safeguards – standard contractual clauses (Article 93(2) of the GDPR). Copy of these safeguards may be obtained by You upon a prior written request sent to: privacy@mwadvising.com. We may instruct You on further steps to be taken with a purpose of obtaining such a copy, including Your obligation to assume confidentiality commitments in connection with being disclosed the Company's proprietary data and personal information of third parties.

Your request to obtain a copy of the appropriate safeguards must contain the following subject: "REQUEST TO OBTAIN A COPY OF THE DATA TRANSFER SAFEGUARDS". Requests not conforming to the instructions above may not be considered. Processing of Your request may take some time. Please don't repeat the request unless We ask You to do so.

Your Rights in Respect of the Data Processing and Personal Data Retention



What this section is about: We provide You with explanations as to what rights You have in relation of processing Your data towards Us and how You can exercise them, including the data retention periods

As part of accessing and using the Landing and Our Services, You shall be entitled to certain rights set out by the GDPR. Please note that exercise of some of those rights may not be possible due to Our inability to carry out Your full identification, or due to other circumstances.

Right to Access:

You may request all personal data being processed about You by sending the right to access request to: privacy@mwadvising.com. The subject of the request must contain: "REQUEST TO ACCESS THE PERSONAL DATA".

Please take account for the fact that in the event the data We possess in Our systems may not be proved to belong specifically to You and You only, We may reject the request.

Right to Rectification:

Your full name, contact details, address, payment details may be corrected either directly on the Landing (if the Customer cabinet is provided) or by sending Us the respective request to: privacy@mwadvising.com

Right to Erasure (Right to be Forgotten):

Our legal and accounting requirements may not allow Us to erase the personal data We possess about You and which relates to provision of Services to You. We may need this data for future to protect Our rights and interests or respond to official requests from authorities and courts. Other personal data, which may be deleted without impeding Our legal requirements and interests, may be erased. The subject of Your request to delete the personal data must contain the following headline: "REQUEST FOR DELETION OF DATA".

Please take account for the fact that in the event the data We possess in Our systems may not be proved to belong specifically to You and You only, We may reject the request. Please send Your request to: privacy@mwadvising.com.

Restriction of Processing:

You shall have the right to request restriction of processing from Us if You contest the personal data accuracy or object to processing of the personal data for direct marketing. However, exercise of the right to restriction of processing may not be possible in relation to certain Personal data.

Objection to Processing:

You can object to the processing of personal data which we process in reliance on Our legitimate interests (currently, there are no such categories of data). You also will be able to object to marketing newsletters (for this purpose We will obtain Your consent).

Right to Data Portability:

We don't currently provide a possibility to import Your personal data into another software product. At the same time, You can exercise You right to data access set out above.

Consent Withdrawal Right:

If You give us Your consent for processing a specific category of data, then You have the right to withdraw this consent. For instance, by changing Your cookie choices on the Landing.

Automated Decision-Making, Profiling:

Currently We don't utilize any automated decision-making or profiling. We will obtain Your consent prior to conducting them.

Personal Data retention Period or Criteria for Such Retention:

Your Personal data will be retained till:

- (1) The data is necessary to provide You the Services and make the Landing with all supported features accessible to You (please see the Data Flows Maps above for more guidance on the retention periods);
- (2) The data has been deleted upon Your respective request;
- (3) We have been mandated or ordered to permanently delete the personal data We have about You by the court order or a lawful authority's request;
- (4) in other circumstances stipulated by applicable laws.

In addition to Your rights relating to the data processing above, You are entitled to file a complaint with a competent data protection supervisory authority.

Security of Processing and Breaches



What this section is about: We provide You with explanations as to what technical and organizational measures We use to secure Your personal data processing and what actions We will take to avoid and mitigate the data breaches

Technical and organizational measures used by Us to secure the personal data processing:

- data encryption (pseudonymisation) which is used at all stages and phases of processing;

- multi-factor authentication, storing encrypted data on reliable and resilient servers ensuring access only to specifically authorized persons;
- securing Our premises where We store Our hardware and software used to operate and support the Landing, process Your orders and do other activities necessary to deliver the Services to You, with alarm systems and providing specific entry pass and access keys, cards and codes to Our authorized personnel in all territories where We have Our operational facilities;
- teaching and instructing Our staff on the data protection issues. Where possible, We strive to conduct internal data protection trainings to the people engaged by Us;
- execution with Customers – controllers of the data and vendors, data processing agreements as well as standard contractual clauses for transfer of personal data to the United States.

We will make our best efforts for prevention of any personal data breaches. If We find out the personal data breach, We will start the procedure of assessing risks to Your rights and interests and if such risks are expected to be serious and they cannot be mitigated by taking technical and organizational security measures, We will communicate information about this breach to You as soon as possible under the GDPR stipulations, meanwhile taking all reasonable measures and making all efforts possible to mitigate the adverse consequences.

Contacts and Amendments to the Privacy Notice



What this section is about: We provide You with explanations as to how We will implement changes to this Privacy Notice and what communication channel You can send your questions to

You are welcome to send Your queries and questions related with the Privacy Notice and processing of Your personal data to: privacy@mwadvising.com.

Amendments to the Privacy Notice may be presented in the form of the updated document. We also can arrange the updates by archiving the previous versions of the document accessible in the electronic form on the Landing. Please check the Privacy Notice regularly to stay up to date with Our data processing activities.