

## **PRIVACY POLICY**

When visiting the website cpabro.vip, CPA BRO may receive information that you voluntarily provide when you fill out a “sign up” form and may collect certain ‘cookie’ information from your device. Such information may include personal information such as your name, email, telephone number when you fill out a “sign up” form.

Please note that you are not required to provide us personal information when you use mentioned website. CPA BRO is not directed to users under 18 years of age and we do not intentionally or knowingly collect personal information on such users.

This Privacy Policy ("Privacy Policy") applies to all information and data CPA BRO could receive about users when such users visit the website cpabro.vip, the websites of our partners, clients, advertisers. Privacy Policy provides information about our website and our platform which enables our partners to use our services and then describes our principles about data collection and use.

It also describes the type of data CPA BRO collects and utilizes when showing ads to users. CPA BRO provides its services strictly in accordance with the appropriate legislation regarding the collection and processing of data, the principles and rules of international legislation regarding the collection, processing, and protection of data.

## **COLLECTION OF INFORMATION**

1) If you however decide to request any information via the contact form provided on our Website, we will ask for your name and e-mail address in order to handle your personal request or to provide the services you requested from us.

2) Our Website is an affiliate network offering a user-friendly platform for interaction between publishers (hereinafter "webmasters") and advertisers. To join our Website and using our services you shall create an account.

As a part of registration process, we may ask you to provide us with the following information, which may include your personal data:

- your username for salutation;
- e-mail address for your authorization in registration purposes, for information and notification purposes during using our Website, for technical support issues;
- payment details (e-wallet address, bank account etc.) if applicable.
- your language (it will help us to speak with you one language);
- password for your account on our Website (please, select for your own safety a secret and secure password in order to ensure the confidentiality of your data; in the event that you forget your password, please use the “Forgot password” function provided on the website to create a new, secure password);
- your professional experience in internet advertising, performance marketing (for Webmasters);
- information about advertising campaign and link to product website (for Advertisers).

All mandatory information required in order to register is marked accordingly. All further information is provided voluntarily; this data is used for the purposes stated, or to improve our online services.

We hope that you will provide us with this information. By registering on our Website you agree with our Terms of Use and the use of your abovementioned personal information in accordance with this Privacy Policy. However, if you do not want to disclose your personal data to us, please, do not submit it. This means that we will not be able to provide you the service you have requested.

3) Providing Internet advertising services our Company may collect anonymous data of users regarding the IP address of the user's equipment, the Internet service provider, device type, browser language in use, and his version of the operating system installed on user's equipment, information about user's visited sites where our advertising placed such as the URL address, the date and time of visits, the pages viewed, time spent.

**WE MAY EXPAND THE LIST OF PERSONAL DATA REQUESTED FROM YOU BY AMENDING THIS POLICY.**

If you would like to register an account on our Website and accept our Terms of Use, than we need information about you for the following purposes:

- to fulfill your request/claim from contact form on our Website;
- to provide you an opportunity to use services of our Website, including, but not limited to creating an account, billing purposes: making payouts (if you are Webmaster), receiving payments from you (if you are Advertiser), providing you with technical support, etc.;
- understand and meet your needs and preferences;
- develop new and enhance existing service and product offerings;
- monitoring and analyzing trends, statistics, usage and activities in connection with our Website;
- marketing purposes (add you to our email subscription list, send you promotional materials, our partner's information, to implement targeted display ads, etc.); you will only receive advertising if you have given your explicit consent;
- meet legal and regulatory requirements.

If you are a user whose data was collected during provision of Internet advertising services by our Company you shall know that the usage of your personal information varies depending on the relevant advertising campaign and customer. You will be informed thoroughly about any usage of your personal information on the relevant website or within the relevant campaign. We need your personal data only for the following purposes:

- to detect fraud including creating fraud reports to be shared with advertisers/publishers;
- to determine the performance of campaigns distributed through publisher's inventory and network and billing purposes;
- to implement personalized or behavior-based advertising (behavioral targeting);

Non-personally identifiable information may be used to analyze trends and statistics, enhance the Website's operation, and serve content and advertisements.

We will process your personal data legally and fairly and not use it outside the purposes of which we have informed you.

## **STORAGE OF PERSONAL DATA**

Data provided to us is stored in accordance with applicable laws. We take reasonable steps to ensure that the personal information we collect about you remains accurate, timely, and secure. In order to avoid loss or misuse of data stored by us, we take necessary technical and organizational safety measures, which are regularly checked and updated.

Unfortunately, there is not any data transmission over the Internet which can be guaranteed to be 100% secure and while we strive to protect your personal information, we cannot guarantee or warrant its complete security. We shall not be responsible for losses that you or any person may suffer as a result of a breach of confidentiality in respect to your use of the Website or any information you transmit to the Website. Also, we do not assume any responsibility for the data you submit to or receive from us through the Internet or for any unauthorized access or use of that information and we cannot and do not guarantee that information communicated by you to us or sent to you by us will be received or that it will not be altered before or after its transmission to us.

We have not any technical influence on third parties, which are beyond our control.

We are going to store your personal data until your request to terminate Terms of Use between us. If you do not want to use services of our Website anymore and You wish to delete your account, please, notify us in your account or by contact form.

The company does not store user card data, but uses a payment service provider to process this data.

## **TRANSFER OF PERSONAL DATA**

We shall not pass by any means or/ and under any circumstances your information to third parties, except for the provision of this information to such third parties, which operates on our behalf and solely for the provision of Internet advertising services, or to the Advertiser at his request to check Webmaster and his traffic. You agree that we instruct third parties to process payment transactions and to forward the provided payment requisites and billing information to them solely for this purpose. We are using certified payment service providers in order to process your payments.

## **DISCLOSURE OF PERSONAL DATA**

We may disclose information that we collect about you should we have reason to believe that:

- it is necessary to identify, contact, or bring legal action against persons or entities who may be causing harm to you, us, or others;
- it is necessary because of official inquiry of governmental authorities;
- it is necessary securing compliance with law's provision or with requirements of judicial

proceedings concerning us;

- we may also disclose information when we believe the law requires it.

## **ACCESS OR CORRECTIONS TO YOUR INFORMATION**

You are able to rectify, update or change your personal data provided to us in your account, except e-mail address. E-mail address is a unique identifier in our system and it cannot be changed. Unfortunately, if you want to use our Website with another e-mail you need to sign up again on our Website. If you did not sign up on our Website, but you have reasons to believe that we have your personal data, please, contact us in our contact form on Website.

In addition, you may request us to delete your personal data from our database.

You may also opt out of receiving promotional communications from us at any time by following the instructions in those communications. If you opt out, we may still send you non-promotional communications, such as technical notices, support or administrative notifications or information about changes to this Policy and using services on our Website.

You also have other rights, which are provided to you by data protection law, including but not limited to: to request access and have free access to your personal data that have been provided to you and that have been subject to processing; to restrict processing of your personal data; right to revoke any consent given to the processing of personal data at any time; object to processing based on the balancing of legitimate interests; right of appeal to the competent data protection supervisory authority; to be aware of the amendments made to the terms of this Policy in an efficient manner before the implementation of new amendments or, otherwise, of the new information processing policy; to have easy access to the text of this Policy and its amendments and etc.

If you have any request, complaint or claim to us in relation to processing of your personal data by us, please, send us a message in our contact form on Website (if you have registered account on our Website, you can do it there). Your message must contain:

- your designation (if applicable), for example, advertiser or publisher (web-master);
- your name and e-mail address;
- description of the facts that give rise to the request, claim or complaint and the purpose sought (update, correction or deletion, or fulfillment of duties).

We consider all requests from you within 15 days. Before answering the claim, we shall verify your identity and find your personal data in our database. If the claim or information provided is incomplete, we will request additional information for your identification, which shall be provided by you within 5 days of receipt of the claim to remedy the failures. If you fail to submit the required documentation or information within 5 days of the date of the initial claim, you shall be deemed to have waived the claim. Once your request has been received with complete information, the 15 days' term will start again. When it is not possible to answer your request within such term, we will inform you about the reasons for the delay and of the date when your request will be dealt with, which in no case may exceed 30 days following the expiration of the first term.

If you want to delete your account, please contact us at your account. If deletion is not possible for legal reasons, access to the data in question shall instead be blocked. Please note, however,

that we may be unable to continue offering some or all of the services provided on our websites requiring registration in the event that your data is deleted or blocked.

## **COOKIES FILES**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyze web traffic or lets you know when you visit a particular site.

Most web browsers are set to accept cookies as a default.

Using our website is possible without cookies. User can disable or delete cookies at any time via altering settings in his browser in order to stop or limit your device receiving and storing cookies or to be notified before receiving cookies. However, disabling cookies can lead to the non-operability or limited access to some parts of website cpabro.ru or cpabro.vip and websites of our partners. Besides, user can be deprived of some opportunities which we offer.

## **THIRD-PARTY LINKS**

The Website may contain links to web sites operated and maintained by third parties over which we have no control. Any information you provide to third party websites will be governed under the terms of each website's privacy policy and we encourage you to investigate and ask questions before disclosing any information to the operators of third-party websites. We bear no responsibility or liability whatsoever for the content, actions, or policies of third-party websites. The inclusion of third-party websites on our Website in no way constitutes an endorsement of such websites' content, actions, or policies. Please, check third-party's policies before you submit any personal data to these websites.

## **PROTECTION OF MINORS**

Persons under 18 years are excluded from our services and from providing any personal information without the consent of their parents or guardians. We do not request personal information from children and adolescents. We do not knowingly gather or collect such data and do not disclose it to third parties. If, however, we become aware that personal data regarding a child under the age of 18 has been collected on the Website we will make reasonable efforts to delete it from our records immediately.

## **GDPR CLAUSE**

In operating the Website cpabro.vip, CPA BRO processes data as a controller (as such terms are defined in the GDPR). As a controller, CPA BRO is committed to fulfill data subjects' ('users') GDPR rights.

If you are EU resident, you may:

- access the data that CPA BRO keeps about you. CPA BRO may need to ask you to provide us certain credentials to make sure that you are who you claim you are. If you

find that the data is not accurate, complete or updated, then you may provide us with the necessary information to rectify it.

- contact us if you want to withdraw your consent to the processing of your personal information. Exercising this right will not affect the lawfulness of processing based on consent before its withdrawal.
- request to delete or restrict access to your personal information. CPA BRO may postpone or deny your request if your personal information is in current use for providing the services or due to other legitimate purposes, such as compliance with regulatory requirements associated with CPA BRO.

If you exercise one (or more) of the above-mentioned rights, in accordance with the provisions of applicable law, you may request to be informed that third parties that hold your personal information, in accordance with this Privacy Policy, will act accordingly.

- you may ask to transfer your personal information in accordance with your right to data portability.
- you may object to the processing of your personal information for direct marketing purposes.
- you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affecting you.
- you have a right to lodge a complaint with a data protection supervisory authority.

If you have any concerns about the way CPA BRO process your personal information, you are welcome to contact to CPA BRO by email [info@cpabro.vip](mailto:info@cpabro.vip) or other available methods (Via messengers).

CPA BRO will look into your enquiry and make required efforts to resolve your case.

CPA BRO conducts periodical assessments of its data processing and privacy practices to ensure that it complies with this Policy, update the Policy when necessary, and ensure that the policy is properly displayed and accessible.

## **MODIFICATIONS TO POLICY**

This Policy may be amended from time to time. We reserve the right to change this Privacy Policy at any time. Any changes to this Policy will be effective immediately upon posting the latest version on our Website. We will inform you by available methods (Via messengers) about changes, which may be related to purposes of personal data processing, storage terms, personal data receipts and any other essential changes to this Policy. If you disagree with the changes in our Policy, please do not use the Website after the posting of such changes online and ask us to terminate the processing of your personal data. By using the Website following the posting of changes to this Policy, you agree to all such changes.