

SESSIA PRIVACY POLICY

This Privacy Policy is provided by SESSIA LLC, a company duly organized under the laws of the United States, having its registered office at 16192, Coastal Highway, Lewes, Delaware 19958, USA, hereinafter referred to as “we” and the User accepting this Policy and referred to as hereinafter referred to as “User” or “You”. Each of the parties, Sessia and the User, may be referred to herein as a “Party” or collectively as the “Parties”.

INTRODUCTION

In general, we only collect information that allows us to provide you with the highest level of our Services. In particular, this includes performing simple actions, such as allowing other users to see your profile - your name, photo, phone number, email that you decide to show. It also helps us protect our Services from scams and spam, giving us a unique understanding of what additional services may be useful in achieving all of the purposes outlined in this Policy below.

SCOPE OF APPLICATION

By using our Services, you consent to our collection, use, disclosure, and storage of your personal data and other information. You can be assured that we will only use your information in the manner described in this Policy.

THE INFORMATION THAT WE COLLECT

Registration and account details.

When using our Services, you voluntarily provide us with personal information (e.g., name, email address, date of birth, age, phone number) and thus are not an anonymous user to us. This also means that your name, photo, phone number, and email address (if you choose to provide them) will be visible to other users. When you install the application, you will also be asked to grant access to your mobile device's address book. We only collect and store the phone numbers and names of all your contacts on our servers (whether they use Sessia or not) to enable communication between you and your contacts. We also ask you to provide passport data in accordance with the terms of the Sessia User Agreement by sending a scan or copy of your passport by email to info@sessia.com or by uploading a scanned copy of your passport in the Sessia application if this function is available in the User's country.

INFORMATION ABOUT ACTIONS

When using Sessia, we will track, and other users will be able to see the rating and status information of companies connected to Sessia. We will also receive and display information about posts you like, comments you make, and purchases you make through our shopping service. Additionally, we collect information about calls made through Sessia but do not display it to other users.

INFORMATION FROM OTHER SOURCES

The information we collect may be combined with information from external sources (such as demographic information and additional contact information) that we have obtained in accordance with the law.

ADDITIONAL INFORMATION

We may collect additional information when you access the application through a specific device (for example, your mobile device's unique identifier and information about its model and operating system).

USE AND STORAGE

Our mission is to improve our Services continually and offer you new opportunities. As part of this task, we may use the information you provide to:

1. Ensure the availability of our Service:

We use your registration and account information to (i) register you in the Application and create your Sessia User Account; (ii) create your profile and make it visible; (iii) provide support, provide you with information about your account and respond to your requests; (iv) provide a personalized experience by providing content (such as feed posts) within the Service; (v) indicate which of your contacts are already using Sessia.

2. Improve our Services

We use Service usage information to better understand network behavior and trends and identify potential outages and technical problems.

3. Process your payments:

We may use your information, such as your name, phone number, or account number, to process your payments for purchases at partner stores represented in Sessia using bonuses and rewards, payments associated with the use of your account numbers, and bank cards we make through third-party safe service providers.

4. Prevent fraudulent activities and spreading spam; ensure compliance with current legislation:

We fight spam and fraudulent content to ensure our users always feel safe. We may use your information to prevent, detect, and investigate fraud, security breaches, and potentially prohibited or illegal activities and to protect our trademarks. The information may include URLs found in messages that other users have flagged as spam or otherwise found spam and identified by operating system authentication services. We reserve the right to use automated systems to block accounts based on such information and the rules we create to protect law-abiding users and prevent further information leaks. If your account has been blocked, please contact support. We may use your information and activity data to comply with applicable laws.

5. To communicate with you:

You are a full member of the Sessia family, and we would like to stay in touch with you. We may use your information to communicate with you (via message or other means) to ensure that the Application is supported and that you interact correctly with it.

DATA STORAGE

Unless otherwise stated, we retain information for as long as it is necessary and relevant to us to achieve the above purposes or to comply with our legal data protection obligations. Once your account is deactivated, we will retain the minimum amount of your data that we are required to retain by law or another legal requirement. We may store activity data anonymously to improve our service. Your messages in the comments in the feed may remain available until you delete them yourself.

INFORMATION DISCLOSURE

You can be confident in the safety of your data. However, we share your personal information with our trusted partners to provide you with the following services:

1. Suppliers of goods from Sessia stores, payment services, and other third parties:

We may disclose your information as part of contracts with service providers and other third parties who help provide you and others with our Services on our behalf or other services that are provided by third parties through Sessia (including, but not limited to, investigations related to fraud and spam, payment processing, site operation, and analytics, providing special partnership opportunities with our Service -

either without identifying users or using a unique identifier not tied to the user's identity). This is necessary to protect data received by third parties.

2. Legal and law-related responsibilities:

We may disclose your information to law enforcement, government agencies, or authorized third parties in response to a verified request related to the prevention of terrorist activity, criminal matters, suspected illegal activity, or in relation to any other activity that may involve you, legal liability on our part or on the part of any other Sessia user.

3. Change of management structure - New ownership:

We may share your information with another entity in case of a potential merger with such an entity or if such entity plans to acquire SESSIA or is involved in a transaction with a similar financial outcome. In such an event, we will make every reasonable effort to ensure that the newly merged entity or other entity complies with the terms of this Policy with respect to your personal information. If your personal information was intended to be used for another purpose, we will require that the new entity provide you with advance notice.

PUBLICLY-PROVIDED INFORMATION

Some of our Services allow you to openly share information with other users. If you post it through social networks, plugins, or other applications, please remember that this information is public to users of our Service and may also become public online depending on your privacy settings. Some social networks allow you to manage your privacy settings to control whether your information is shared with other users. Because third parties are beyond our control, please review their privacy policies and terms of use to better understand the measures they use to keep your information safe.

COOKIES AND TRACKING TECHNOLOGIES

When you register in the Application, we ask for your prior consent to the use of cookies and tracking technologies. We offer certain features that are only available through the use of tracking technologies. We use in-session tracking technologies and continuous tracking technologies. Tracking technologies (such as cookies) can be persistent (that is, the files they use remain on your computer until they are deleted) or temporary (that is, the files are stored only until you close your browser or until you exit the Application). You are always free to decline the use of tracking technologies if your browser supports such an option, although if you do so, you may experience difficulty using the Application and the Website. We recommend you consult your browser's user manual, browser add-ons, or installed applications for instructions on blocking, deleting, or disabling tracking technologies such as cookies. Sessia uses secure and encrypted tracking technologies to ensure that only we can interpret the information they collect. You may encounter tracking technologies/cookies from third-party service providers to whom we have provided access to the Application so that they can assist us with various aspects of the Application's operations and services, such as Google Analytics.

REGIONAL PECULIARITIES

Peculiarities for residents of California (USA) and European Economic Area countries

Residents of California (USA) have the right to request a list of all third parties to which our Application has disclosed certain personal information (as permitted by California law) in the preceding year for such third parties' direct marketing purposes. If you are a California resident and would like to receive such a list, please contact us at info@sessia.com. For any requests, please ensure that you include a statement of "Your California Privacy Rights" in the body of your request and include your name, address, city, state, and zip code. With your request, please provide us with sufficient information to enable us to determine whether the above legal requirements apply to your situation. You must certify that you are a California (USA) resident and provide a current California address to receive our response. Please note that we do not accept submissions by telephone, mail, or fax and are not

responsible for submissions that are labeled or submitted inappropriately or that do not contain complete information. Currently, Sessia does not take any action to address Do Not Track signals, as the corresponding uniform technology standard is still in the development phase. We continue to explore new technologies and may adopt such a standard when it is developed.

Privacy rights within the European Economic Area

If you use our services in the European Economic Area, you have certain rights under local law in relation to your personal information. Subject to these rights, you may access your personal information, fix the information we're storing, erase your personal information, limit our use of your personal information, receive your personal information in a prescribed electronic format, and forward it to third parties (right to data portability), file a complaint with your local data protection authority. Read more about how to exercise your rights in the European Economic Area [here](#). If you would like to better understand or exercise your rights, please use the contact details below to contact us. We will contact you if we require additional information to fulfill your request.

We require a legal basis to process your personal information. In most cases, this basis may be:

- fulfilling our obligations under a contract with you, such as providing services or ensuring that bills are paid properly;
- your consent to data processing;
- compliance with our legal obligations as set out above;
- compliance with our legitimate interests, such as wanting to understand how you use our products and services and using this information to develop new products and services, personalize the service, and display targeted advertising. When processing personal information as part of our legitimate interests, we use appropriate measures to ensure your privacy and to ensure there is no conflict between our business interests and the interests and fundamental rights and freedoms of users;
- protection of vital interests of the subject of information or other person;
- the need to implement any action in the interests of society.

We may seek your consent to collect and use certain personal data per applicable law (for example, with respect to cookies and tracking technologies or in the case of the use of user location data for purposes not related to the provision of services). If you have given us consent to process your personal information, you may withdraw that consent at any time by using the in-app support form or by emailing info@sessia.com. Please contact us if your personal information has changed and you would like to update or change it or if our stored personal information is incorrect. We are always willing to work with you to respond appropriately to your complaints or privacy concerns. If you feel we have not been able to resolve your issue, you have the right to file a complaint with your local data protection authority or the relevant authority in Luxembourg.

THIRD-PARTY WEBSITES AND APPLICATIONS

Our application may contain links to third-party websites, or you may access Applications through such websites. We are not responsible for the privacy practices or content of third-party websites.

SAFETY

We take technical, physical, and administrative security measures to protect your personal information from loss, misuse, unauthorized access, disclosure, or modification. Some of the security measures we use include firewalls, data encryption, physical access controls to our data centers, and information access authorization controls. We also need your help: you are responsible for ensuring that the personal information you provide is accurate and that your password(s) and account registration details are kept secure and protected from access by third parties.

PRIVACY REGARDING CHILDREN

Our services are not intended for children under 18 years of age. Accordingly, we do not, at least knowingly, collect personal information from anyone under 18 years of age using our websites, applications, services, or tools.

CROSS-BORDER DATA TRANSFER

We operate internationally and provide our Services to users worldwide, allowing them to communicate with each other and make purchases anywhere in the world. This means that your personal information may be processed in countries where data protection and privacy regulations may not provide the same level of protection as in your country. We store and process your personal information on our computers in the United States, Asia, Europe (including Russia), Australia, and Brazil and use suppliers who may be located in various countries outside the European Economic Area. In such cases, we require the recipient to ensure adequate protection of the personal data received per applicable laws on protecting such information.

POLICY UPDATES

As we develop our services, we may update this Policy from time to time. You agree that we may notify you of material changes to our personal information practices through a notice in the Application. Please check the Application regularly for such notices.