

Privacy and Cookie Policy

The company Numtoo OÜ (hereinafter referred to as "Numtoo," "we," "us," or "our"), registered in the Estonian Commercial Register under registration number 16039501, with its legal address at Estonia, 74626, Harju County, Kuusalu Parish, Pudisoo, Männimäe 1, has prepared this Privacy and Cookie Policy (hereinafter referred to as the "Privacy Policy") to inform you about our methods of collecting, using, and disclosing personal information that you provide to us when visiting our websites: www.popcorn.tel, www.numtoo.ee, <https://t.me/popcornsupport>, <http://t.me/PopcornMobileSupportBot> (hereinafter referred to as the "websites"). Additionally, this Privacy Policy describes the type of information that may be collected through the use of cookies and other technologies on our websites.

This Privacy Policy applies to the websites and any authorized subdomains that explicitly accept, display, or reference this Privacy Policy. By using the websites, you consent to the collection and use of your information in accordance with this Privacy Policy by us as the controller of your personal data. If you do not agree with this Privacy Policy, please do not use our websites. It is important that you understand that by using our services, you consent to the collection, use, disclosure, and storage of your personal data.

Since we are a company registered in the Republic of Estonia, the processing of your personal data is governed by the laws of the Republic of Estonia.

Please take the time to read this Privacy Policy carefully. If you have any comments, questions, or concerns, you may contact our Data Protection Officer (hereinafter referred to as the "DPO"), Tatiana Gromut, at: numtoo@numtoo.ee. We will respond to your request via email within one month at the latest. Please note that before we can provide you with the requested information, we will need to verify your identity.

This Privacy Policy does not constitute a contract between us and an individual. If we modify or update our Privacy Policy, we will publish the latest version on our websites. We recommend that you periodically review this Privacy Policy for any changes. Amendments to this Privacy Policy will take effect upon publication on the webpage: www.popcorn.tel.

We will always be transparent and honest about how we handle personally identifiable information. You have several rights that you can exercise to control your privacy. We want to help you exercise your rights, so below we explain how to do so.

You have the right to file a complaint with a supervisory authority at any time. The Estonian Data Protection Inspectorate (registered office at Väike-Ameerika 19, 10129 Tallinn, phone +372 627 4135, email info@aki.ee) is the lead supervisory authority for data protection.

Data Protection Principles

First and foremost, we emphasize that we adhere to all relevant data protection principles when processing your personal data. These principles are:

1. Lawfulness, Fairness, and Transparency – We process your personal data lawfully, fairly, and transparently.
2. Purpose Limitation – We collect your personal data only for specific, explicit, and legitimate purposes and only for as long as necessary to achieve those purposes.
3. Data Minimization – We ensure that the personal data we process is adequate, relevant, and limited to what is necessary for our processing purposes.
4. Accuracy – We take all reasonable steps to update or delete inaccurate or incomplete information. You have the right to request the deletion or correction of incorrect information concerning you, and we will do so within one month.
5. Storage Limitation – We delete your personal data when it is no longer needed.
6. Integrity and Confidentiality – We ensure the security and protection of your personal data against unauthorized or unlawful processing, as well as against accidental loss, destruction, or damage, by implementing appropriate technical and organizational measures.

Personal Data We Collect and Purposes of Processing

Personal data refers to any information relating to an identified or identifiable natural person. You do not need to provide us with any personal information to use most of our websites. However, we may collect personal information that you voluntarily provide when requesting information about our services, submitting inquiries, subscribing to our services, or sending us your resume in connection

with job opportunities posted on our websites. Any information you submit for job applications will be treated with the utmost care and used solely for that purpose.

For the purposes of this Privacy Policy, we are the data controller of your personal information and determine the purposes and means of processing any personal data collected on our websites. We do not sell, share, or transfer this information, except as specified in this Privacy Policy. We use your information to improve our marketing, administration, and service delivery.

If you subscribe to our newsletter through our websites or otherwise provide us with your contact details, Numtoo may send you updates, newsletters, or other alerts that may interest you. For marketing purposes, we may track whether you open and/or click on links in our newsletters.

How Do We Use Your Personal Data?

Numtoo will use your personal data for customer service, providing you with requested information, and customizing the information we offer on the websites. Your personal data is used to respond to your inquiries, develop proposals for you, and for general internal business purposes.

We require all service providers to process your information securely and in compliance with EU data protection laws. We use standard mechanisms provided by EU law to legitimize data transfers outside the EU.

If Numtoo is sold or merged with another company in whole or in part, or declares bankruptcy, some or all of the data collected from you may be transferred to a third party as part of the asset transfer. Numtoo may also disclose your data in compliance with legal requirements or to protect the interests or security of Numtoo, another website, or visitors.

Processing of Special Categories of Personal Data

Numtoo will not collect or use information revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for unique identification, health data, data concerning your sex life or sexual orientation, or any other sensitive information.

Legal Basis for Processing Personal Data

We collect several types of information for various purposes to provide and improve our services. Our legal basis for collecting and using personal data as

described in this Privacy Policy depends on the data we collect and the specific context in which we collect it.

Numtoo may process your personal data because:

- We need to enter into a contract with you;
- You have given us consent to do so;
- The processing is in our legitimate interests and does not override your rights or comply with the law.

We use the collected data for various purposes:

- To provide, maintain, and improve our websites;
- To notify you of changes to our websites;
- To collect, analyze, or generate valuable insights to enhance our websites;
- To monitor website usage;
- To provide visitor support;
- To compile anonymous usage statistics;
- To detect, prevent, and resolve technical issues;
- To comply with legal and regulatory requirements;
- To protect your and our rights;
- To respond to your inquiries;
- To contact you for administrative purposes to resolve relevant issues.

Links to Third-Party Websites and Applications

Our websites may contain links to third-party websites and applications not affiliated with us. We do not endorse or make any representations about these third-party websites and applications. Any information you provide on third-party websites or services is submitted directly to their operators and governed by their privacy policies, even if accessed through our websites. We are not responsible for the content or privacy and security policies of third-party sites or services linked to or accessible from our websites. We recommend reviewing third-party privacy and security policies before providing them with information.

We may engage third-party companies and individuals to facilitate our websites, provide services on our behalf, assist with related services, or help us analyze website usage. These third parties have access to your personal data only to perform these tasks on our behalf and are obligated not to disclose or use it for other purposes.

Disclosure and Transfer of Personal Data

We process your personal data within the European Economic Area (EEA), so your information may be transferred to and stored on computers located outside your country or jurisdiction, where data protection laws may differ. We will comply with data confidentiality requirements by ensuring adequate safeguards and take all reasonably necessary steps to ensure your data is treated securely in accordance with this Privacy Policy. Your personal data will not be transferred to an organization or country unless appropriate controls, including data security measures, are in place.

Under certain circumstances, we may be required to disclose your personal data if required by law or in response to valid requests from public authorities (e.g., a court or government agency). We also reserve the right to disclose personal data or other information we deem relevant or necessary to:

- Take precautions against liability;
- Protect ourselves or others from fraud, abuse, or illegal activities;
- Investigate and defend against third-party claims or allegations;
- Protect the security or integrity of our services and any equipment used to provide them, safeguard our property or legal rights, enforce our contracts, or protect the rights, property, or safety of others.

We will notify visitors through our communication channels of requests made by public authorities, where permitted by law.

Cookies and Tracking Technologies

We use automatically collected information and other data gathered on our website and services through cookies and similar technologies. A cookie is a small piece of data temporarily stored on a visitor's hard drive containing information about them. A cookie includes your contact details and data that allows us to identify your computer via our websites. You can accept or decline cookies. Most web browsers automatically accept them, but you can usually modify your browser

settings to decline cookies if you prefer. However, if you do not accept cookies, you may not be able to use some parts of our websites.

Google Analytics and Yandex Metrica

We use Google Analytics and Yandex Metrica to measure and evaluate website access and traffic and to generate visitor navigation reports for our administrators. Google and Yandex operate independently from us and have their own policies, which we strongly encourage you to review. Google and Yandex may use the information collected via Google Analytics and Yandex Metrica to evaluate visitor activity on our websites. For more information, see Google Analytics' and Yandex Metrica's Privacy and Data Sharing policies.

We take measures to protect technical information collected via Google Analytics and Yandex Metrica. The collected data will only be used if necessary to resolve technical issues, administer services, or determine visitor preferences, but in such cases, the data will be anonymized. We do not use this information to identify our visitors.

You can opt out of having your actions on the websites tracked by Google Analytics by installing the Google Analytics opt-out browser add-on. This add-on prevents Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing visit data with Google Analytics.

You can opt out of Yandex Metrica tracking by downloading and installing the Yandex Metrica blocker at: <https://yandex.ru/support/metrica/general/opt-out.html>.

Community Features

The websites may provide chats, forums, bulletin boards, and/or other community features. Please remember that any information you disclose in these areas becomes public, and you should exercise caution when deciding to share personal, financial, or other sensitive information.

Security and Storage of Personal Data

Numtoo will take reasonable steps to ensure the accuracy, completeness, and timeliness of the data we collect, use, or disclose.

Numtoo will take all reasonable steps to ensure that the personal information we store is protected against misuse, loss, or unauthorized access, modification, or disclosure.

However, please note that no electronic transmission or storage of information is 100% secure. Therefore, despite the security measures we have implemented to protect your personal data, we cannot guarantee that loss, misuse, or alteration of data will never occur. If we become aware of a security breach, we will notify you and the relevant authorities in accordance with applicable laws.

Numtoo will also take reasonable steps to destroy or anonymize your personal data when it is no longer needed, unless legal requirements mandate its retention.

To determine the appropriate retention period, we consider the volume, nature, and sensitivity of the personal data, as well as the purposes for which we process it. We also consider the periods for which we may need to retain personal data to comply with legal obligations, address complaints and requests, and protect our legal rights in the event of claims.

We retain collected statistical data for analysis for up to three years. Cookies are typically valid for a short period (a day, week, or month), though in some cases, they may remain valid for up to a year.

Your Data Protection Rights

Under certain circumstances, you have the right to:

- Request information about whether we store your personal data and, if so, what data and why we store or use it;
- Request access to your personal data (data subject access request). This allows you to receive a copy of the personal data we hold about you;
- Request correction of the personal data we hold about you. This enables you to correct incomplete or inaccurate data we hold. Note that in such cases, we may delete your profile and/or suspend (temporarily or permanently) our services to you;
- Request deletion of your personal data. This allows you to ask us to delete your personal data if we no longer have a reason to process it. You also have the right to request that we delete or remove your personal data if you have objected to its processing. Note that in such cases, we may delete your profile and/or suspend (temporarily or permanently) our services to you;
- Object to the processing of your personal data if we rely on a legitimate interest (or those of a third party) and there is something about your particular situation that makes you object to processing on this ground. You also have the

right to object where we process your personal data for direct marketing purposes. Note that in such cases, we may delete your profile and/or suspend (temporarily or permanently) our services to you;

- Object to automated decision-making, including profiling, that is not subject to automated decision-making by us using your personal data or profiling you. Note that in such cases, we may delete your profile and/or suspend (temporarily or permanently) our services to you;
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data, for example, if you want us to verify its accuracy or the reason for processing it. Note that in such cases, we may delete your profile and/or suspend (temporarily or permanently) our services to you;
- Request the transfer of your personal data in an electronic and structured format to you or another party (commonly known as the right to "data portability"). This allows you to obtain your data from us in an electronic format and transfer it to another party in that format;
- Withdraw consent. If you have given your consent to the collection, processing, and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we receive notice that you have withdrawn your consent, we will no longer process your data for the original purpose unless we have another lawful basis for doing so. Note that in such cases, we may delete your profile and/or suspend (temporarily or permanently) our services to you;
- Lodge a complaint. If you believe your rights have been violated, you have the right to file a complaint with a data protection authority regarding our collection and use of your personal data. For more information, please contact your local data protection authority in the EEA or the Estonian Data Protection Inspectorate (contact details are provided at the beginning of this Privacy Policy).

If you wish to exercise any of these rights, you may contact us through our contact page or reach out to our DPO.

By using our websites, you consent to the collection and use of your personal data as described.