

PRIVACY POLICY

Last updated: May 01, 2025

- 1. Introduction.** This Privacy Policy (**Policy**) explains how the personal data of individuals (**you, your**) are handled in connection with accessing and using the website, its subdomains and any services available at <https://top.co> (**Website**). This Policy applies to the Website and any use thereof, including the use of services made available on the Website, Newsletters you may subscribe from time to time, when you communicate via email or offline engagement (collectively, the **Services**). By accessing or otherwise using the Website or Services, you agree to collection, processing, disclosure, and use of Personal Data as described herein and you agree to the Terms of Use which shall be read and construed together with this Policy.

The term **Personal Data** in this Policy refers to personally identifiable information you may provide when using the Website, the Services and/or in any other contact with us it, and representatives, except for any anonymised Personal Data. If you are interested in how cookies are used and how to change your cookies choice, please refer to clause **Cookies and Automatically Collected Data**.

- 2. Categories of Personal Data Collected, Purposes of and Bases for the Processing.** When providing the Services to you, your certain Personal Data could be processed for the following purposes

| Purpose of processing | Personal Data | Legal grounds (basis) |
|---|---|--|
| Establishing and managing relationships with you | Identification data, business data, contact data | Evaluation and due diligence prior to relationships establishing, our legitimate interest, meeting our legal and regulatory obligations, contractual obligations |
| Sending email newsletters or newsletters by other means, communicating with you concerning your enquiries | Email address or another address to send newsletters and communications | Your consent, contractual obligations |
| Providing you access to the Website and/or Services | Identification data, business data, contact data | Evaluation and due diligence prior to relationships establishing, our legitimate interest, meeting our legal and regulatory obligations, contractual obligations |
| To administer and protect the Website, the Services, intellectual property and any kind of licensed assets (including troubleshooting, testing, system maintenance, support, reporting and hosting of data) | Identification data, contact data, technical data | Our legitimate interest, your consent, contractual obligations |
| To use data analytics to improve or develop the Website, the | Technical data, usage data | Our legitimate interest, meeting our legal and |

| | | |
|---|--|---|
| Services, intellectual property and any kind of licensed assets, User relationships and experiences | | regulatory obligations, contractual obligations |
|---|--|---|

The data collected or otherwise obtained may include identification data (such as your name, date of birth, residency address and other identification data), contact data (such as your email, telephone number and other addresses/means of communications), technical and usage data (such as details on your actions through the Website and/or Services), marketing and communication data (such as your preferences in receiving marketing and other communications). Your Personal Data are collected directly from you or from other parties you have authorised such collection. There is no process for special categories of Personal Data about you unless you voluntarily provide such data.

By using the Website and/or Services, there may be collection and/or processing of data that is not personal and relates to non-personal information. Such data is collected and processed to improve your user experience.

3. Personal Data Storage Period or Criteria for Such Storage. Your Personal Data will be stored till:

- it is necessary to render you the Services;
- your consent is no longer valid;
- your Personal Data have been deleted following your data deletion request;
- in other circumstances prescribed by applicable laws.

In any event, your Personal Data will not be stored for periods longer than it is necessary for the purposes of the processing.

4. Your Rights in Connection with Your Personal Data Processing. While accessing, browsing of the Website and using the Services, you shall be entitled to exercise certain rights as set forth in applicable regulations, including GDPR and similar regulatory regimes, however it shall be noted that the exercise of some of those rights may not be possible in relation to the Website and/or Services taking into account of the their nature, manner, form and other applicable circumstances. You shall have the right to lodge a complaint with a competent data protection supervisory authority.

- **Right to Access:** you may request all Personal Data via email;
- **Right to Rectification:** exercise of the given right directly depends on the data category concerned: if it concerns online identifiers, then their rectification isn't possible, but such categories of Personal Data as email address may be rectified by sending a request via email;
- **Right to Erasure (Right to be Forgotten):** Personal Data could be deleted by a request via email.
- **Consent Withdrawal Right:** you shall be entitled to withdraw consent to the processing of Personal Data to which you provided your consent. In particular, you can change your cookie choices by using cookie consent tool built in the Website. You can exercise your right to withdraw consent by unsubscribing from the Newsletter;
- **Automated Decision-Making, Profiling:** neither is being carried out, your consent will be sought before carrying out any such activities.

5. Marketing and Informational Communications. You may subscribe to marketing and/or informational communications (**Newsletters**) using the Website, Services or by other means made available to you

by providing your explicit opt-in consent to receive Newsletters. You may withdraw your consent to marketing communications at any time by following the opt-out or “unsubscribe” links in the Newsletters or by emailing at privacy@top.team.

6. **Cookies and Automatically Collected Data.** When you are As you navigate through and interact with the Website and Services, you may be asked to consent to use cookies, which are small files placed on the hard drive of your computer or mobile device, and web beacons, which are small electronic files located on pages of the website, to collect certain information about your equipment, browsing actions, and patterns.

The data is automatically collected from cookies, web beacons, local storages may include information from your web browser (such as browser type and browser language) and details of your visits to website, including traffic data and logs, page views, length of visit and website navigation paths as well as information about your device and internet connection, including how you interact with the Services. This data is collected in order to improve the Website and Services. The information is collected automatically and may also include statistical and performance information arising from your use of Services and website. This type of data will only be used in an aggregated and anonymised manner.

7. **Transfer and Disclosure of Your Personal Data.** For the purposes of allowing your access to the Website and rendering the Services, your Personal Data may be shared with certain categories of recipients and under certain circumstances:

- **Service Providers and Advertising Partners:** providers, consultants, advisors, vendors and partners acting as data processors, which may supply hosting services, web analytic services, technology and support services, legal services, financial services, email marketing, automation services and other similar services. All such providers and partners shall have data processing agreements in accordance with the applicable laws and regulations to protect and secure Personal Data by using appropriate technical and organisational measures;
- **Subsidiaries and Affiliates:** Personal Data may be shared with parent, subsidiary, joint venture partners and other affiliates under the common control subject to this Policy;
- **Authorities:** in strict compliance with applicable laws and regulations, Personal Data may be shared with governmental authorities upon their decision, receipt of court orders mandating to disclose the Personal Data. In any such case, it will be strived to disclose only a portion of Personal Data which is definitely required to be disclosed, while continuing to be treated the rest of the data in confidence.

8. **Security and Other Measures.** Your Personal Data is protected from loss, misuse or unauthorised access by maintaining administrative, technical, and physical security measures. Please, however, keep in mind that no security system is flawless or impenetrable, and no means of data transfer can be guaranteed to be free of interception or other types of misuse. Any information disclosed online is subject to interception and exploitation by unwanted parties. As a result, there is no guarantee of the complete confidentiality of any Personal Data you provide.

9. **Third-Party Links and Websites.** Some technologies integrated into the Website and/or Services are operated or controlled by other parties. For example, the Services may include links that hyperlink to websites, platforms, and other services operated or controlled by a third party. Please note that when you interact with these other parties, including when you leave the Website or Services, those parties may independently collect information about you and solicit information from you. You can learn more about how those parties collect and use your data by consulting their privacy policies and other terms.

10. **Contacts and Requests.** Please send all your requests and queries in connection with your rights relating to the Personal Data protection and processing as part of providing the Website and rendering the Services to you to: privacy@top.team.

- 11. Privacy of Minors.** Neither the Website nor Services are meant to be used by anyone under the age of 18. No Personal Data is being knowingly collected from children under 18 years old, unless expressly permitted by their parent or guardian.
- 12. Governing Law and Dispute Resolutions.** Any dispute, controversy, or claim arising out of or in connection with this Policy, or the breach, termination or invalidity thereof, shall be governed by the laws and venue as stated in the Terms.
- 13. Changes to the Policy.** This Policy may be subject to reviews and changes from time to time. If substantial changes are made to the Policy, you will be notified about such material changes by updating this Policy. All such changes are represented by the "*Last updated:*" date. You are encouraged to check back and review this Policy from time to time so you will always be informed of what information is being collected, how it is used, and to whom it is being disclosed.