



# SMARTBRAIN.IO

## PRIVACY POLICY

This Privacy Policy explains how Smart Brain, corp. (“Service”, or “we”, “us” or “our”) collects, uses and shares your personal information when you visit and access the Smart Brain web site. References in the Privacy Policy to the Smart Brain, along with information and services made available to you through the Smart Brain are considered the “Services.”

Smart Brain’s mission is to help Customers to find IT contractors from Eastern Europe. By their very nature, some of the Services will need to collect “private” information. Accordingly, we take special care to hold this personal information in the strictest confidence and protect it from unauthorized access, disclosure or use by Smart Brain or third parties. We are committed to full transparency in how we collect, use and share your personal information. If you have any questions or concerns about your personal information or this Privacy Policy, email us at [info@smartbrain.io](mailto:info@smartbrain.io).

This Privacy Policy applies to personal information and other information we collect:

- On the web site - <https://smartbrain.io/>.
- In emails, text, and other electronic messages between you and Smart Brain.
- By your access to and use of the Services offered on the web site - <https://smartbrain.io/>.

Please read this Privacy Policy carefully to understand our policies and practices regarding your personal information and how we will treat it. By accessing or using the Services, you agree to the terms and conditions described in the Privacy Policy. If you do not agree with these terms and conditions, your choice is not to access and use our Services. By accessing or using the Services, you agree to the terms and conditions described in the Privacy Policy. Please also refer to our Terms & Conditions regarding the terms of use for the operation of the web site, into which this Privacy Policy is incorporated.

All contents of the Smart Brain and the Services, such as text, graphics, images, and other material and information contained on the web site - <https://smartbrain.io/> are for engaging contractors and contractors hereby agrees to be engaged by the Customers to develop the software.

### **Information Collected About You**

To access some of our Services it is not necessary to provide your personal information, while other Services require that you register with us, which includes providing certain personal information as described in this Privacy Policy. Even if you do not register with or provide any personal information, we collect information about your use of the Services. We may also acquire certain information about our users on an anonymous and aggregate basis from external sources to improve the functionality of the Service and the enhance the user experience.

*Information we collect automatically.* Our servers may automatically record certain information about how you when you access or use certain Services. This information may include your Internet Protocol (IP) address, device and browser type, operating system, the pages or particular Service that you viewed and

the time spent on those pages or features or Service, the frequency with which you use access the Service, search terms, the links that you click on or use, and other statistics. We collect this information in server logs and by using cookies and similar tracking technologies to analyze trends, administer Services, track users' movements across the Services, and gather demographic information about our user base as a whole.

*Information you provide voluntarily.* In order to access certain portions of the Services, it is necessary that you register with Smart Brain. Registering requires that you provide certain personal information, including name, email address, telephone number and country of location. You can always terminate your registration at any time and for any reason.

The Service don't request you to provide "sensitive" or "special categories" of personal information, such as health-related information (physical and mental). At any point where this type of information is needed for the requested Service, you will be advised of this need and asked to provide your explicit consent.

*Passwords.* When you register to access the Services, you will be asked to provide a unique log-in ID and password. You are responsible for taking reasonable precautions to protect your login data. You should not share your password with anyone. Smart Brain cannot be held responsible for breach that results from a lost or stolen login or password information.

*Interactive Services.* Some of the available Services are "Interactive" Services, meaning that you may interact in real time with our managers, who may ask you to provide certain additional personal information, which you are free to decline to do so. Any information disclosed during these "Interactive" Services is held in the strictest confidence. These professionals are bound by ethical requirements to maintain the confidentiality of this information. To appear on the Services, these professionals also agree to abide by this Privacy Policy and to maintain the confidentiality of any user information they may be provided.

**Any information (including personal information) you share in any online message board or other chats is by its nature open to the public and is not private. Please carefully consider before posting any personal information in any public chats. If you mistakenly post personal information in our message board or other public chats and would like it removed, you can send us an email to [info@smartbraon.io](mailto:info@smartbraon.io) request that we remove it; however, in some cases, be advised that we may not be able to remove your personal information.**

### **How Information Collected About You Is Used**

Information about your use of the Services may be used for the following purposes:

- To provide, improve and create new Services.
- To respond to your inquiries and to send you administrative communications about your registration, your activity using the Services.
- To obtain your feedback about your experience using the Services.
- To advise you regarding new services, offers or promotions that may be of interest to you based on your use of the Services, including news, announcements, reminders and opportunities from Smart Brain.
- To statistically analyze trends and user behavior and activity including how frequently areas of the Services are visited, how the Services are being used and how many messages are received and opened.
- To protect our legitimate business interests.
- To detect and defend against fraud and other threats to the Services and our users.
- To identify and resolve problems with the Services.
- To conduct research and measurement activities, including those described below.
- To administer your registration.

We may also use your personal information, such as an email address you provided, to send you offers or promotions about other goods and services from us that may be of interest to you. If you do not want us to use your personal information in this way, you can opt out at any time and at no cost. How to opt out is described in the section below, “Your Choices and Rights.” Be advised that you cannot opt out of transactional or administrative emails, such regarding your registration status or Services you have accessed or requested. **We do not provide any personal information to third parties for their marketing purposes.**

### **How We Share Your Information**

We may disclose personal information that we collect or you provide as described in this Privacy Policy:

- To fulfill the purpose for which you provided your personal information.
- To our subsidiaries and affiliates.
- To contractors, vendors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Smart Brain’s assets, including the lists of our users.
- For any other purpose disclosed by us when you provide your personal information.
- With your consent.

However, we reserve the right to disclose aggregated or anonymous information (i.e., information that does not identify you) about our users without restriction.

**We do not disclosure your email to any third party for their marketing purposes.**

We may also disclose your personal information:

- To enter into a contract.
- Comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our End User License Agreement and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Smart Brain, our users, or others. This may include exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

We may also include social widgets, which enable you to interact with the associated social media platforms. These widgets may collect browsing data which may be received by the third party that provided the widget and are controlled by these third parties. You may be able to manage your privacy preferences directly with the applicable social network platform.

### **How Your Information is Secured and Retained**

We have implemented reasonable and appropriate technical, physical and administrative measures to protect the security of your personal information on our servers and systems. Be advised, however, that the transmission of information via the internet or wireless communications technologies is not completely secure. Although

we do our best to protect your personal information when you enter your personal information on the Service, for example by encrypting the transmission of personal information or using SSL connections (SSL) technology, we nonetheless cannot guarantee the security of your personal information transmitted to the Services. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Services.

We will retain your personal information as long as your registration is active or as needed to provide you the requested Services. When you terminate your registration, we will take steps to remove your personal information, but be aware that it is not technologically possible to remove each and every record of the information you have provided from our servers. In addition, see the section, “Your Choices and Rights”, below for more information on how you can update or remove your personal information. We will also retain your personal information as necessary to comply with legal obligations, resolve disputes, prevent fraud and enforce our agreements.

### **Your Choices and Rights**

You can correct, update or review personal information you have previously submitted by going back to the Service, logging-in with your registration information and making the desired change. You can also update any personal information you have submitted by contacting us at [info@smartbrain.io](mailto:info@smartbrain.io).

If you have registered and desire to delete any of your registration information you have provided to us from our systems, please contact us also at [info@smartbrain.io](mailto:info@smartbrain.io). Upon your request, we will delete your registration information from our active databases and where feasible from our back-up backup database. You should be aware that it is not technologically possible to remove each and every record of the information you have provided to us from our servers.

When you sign up to receive email communications from us, you can choose to opt out from receiving them at any time. You can unsubscribe from our emails by:

- Following the directions included at the bottom of the email by clicking on the “Unsubscribe” link.
- Sending us an email at [info@smartbrain.io](mailto:info@smartbrain.io) requesting that you be removed from our communications.

Be advised, however, that you cannot opt out of transactional or administrative emails, such regarding your registration status or Services you have accessed or requested.

### **Links to Third Parties**

The Smart Brain web site may contain links to other web sites and services. We do not control such third-party web sites and services and are not responsible for their actions or privacy practices. The existence of a link does not mean that we endorse or have vetted such third-party website or service. You are encouraged to carefully review the policies and practices of every website and service that you visit or use.

### **For Users Outside the United States**

Smart Brain is located in the United States and the Services are maintained in the United States. Your personal and other information will be stored, processed and accessed on servers located in the United States. If you are located outside the United States, you understand and agree that Smart Brain may transfer, collect, use, disclose, and otherwise process the personal information you provide in the United States as described in this Privacy Policy. We also may transfer your information outside the United States to service providers under contract with us with operations in other countries. By using the Services, you consent to such collection, storage and processing in the United States and elsewhere, though the United States and other

jurisdictions may not afford the same level of data protection as considered adequate in your own country. We will take reasonable steps to protect your personal information. Note that your personal information may be available to the United States government or its agencies under legal process made in the United States.

### **Children's Privacy**

We are committed to protecting the privacy of children. You should be aware that the Smart Brain are not intended or designed to attract children under the age of 13. We do not knowingly collect personally identifiable information from any person we actually know is a child under the age of 13. If a child under the age of 13 has provided Smart Brain with their personal information, we ask that their parent or guardian contact us as provided below to inform us of that fact. We will use reasonable efforts to delete such information from our systems and servers.

### **Changes to This Privacy Policy**

The Effective Date of the current version of the Privacy Policy is provided above. From time to time we may modify this Privacy Policy. We will notify you of any material change by sending a notice to the e-mail address you provided to us or by placing a prominent notice on the website. You can view the most recent version of the Privacy Policy at any time by clicking the "Privacy Policy" link provided on the web site - <https://smartbrain.io/>. Your continued use of the Services after any modification indicates your agreement to the new terms and conditions.

### **Comments and Questions**

If you have comments or questions about our Privacy Policy or your personal information, you may email us at [info@smartbrain.io](mailto:info@smartbrain.io).

#### **Smart Brain Corp**

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