

PRIVACY POLICY

What does this Privacy Policy cover?

This Privacy Policy (hereinafter referred to as “**the Policy**”) describes how LLC “**PROXIMA RESEARCH INTERNATIONAL**” (also referred to as “**Proxima Research International**“, “**PRI**“, “**we**“, “**our**” or “**us**“) will make use of your data when you use the website <https://proximaresearch.com/> and/or <https://events.proximaresearch.com/> (collectively “**the Platform**”). The Platform is a virtual events hosting technology platform which enables Hosts to organize Events and connects them with Participants for providing them services through the Platform which include the following (collectively, referred to as “**Services**”).

- Allowing Hosts to use the Platform to list, organize, conduct, and administer Events on the Platform and provide an interactive feature (audio and video) to interact with Participants;
- Enabling Hosts to promote, market and advertise their Events by creating a promotional page of their Event.
- Allowing Participants to attend and participate in Events conducted by Hosts through the Platform, and/or
- Any other services ancillary to the above Services.

It also describes your data protection rights, including a right to object to some of the processing which Proxima Research International carries out. More information about your rights, and how to exercise them, is set out in the “*What rights do I have?*” section.

Definitions

The following definitions will apply to this Policy, and any reference to the singular includes a reference to the plural and vice versa. Capitalized terms used but not defined below have been defined elsewhere in this Policy.

Events shall mean public events (which mean events, webinars, conferences, meet-ups, festivals, concerts, organized by the Host with the intention of securing participation/Participants from the public at large) and private events (which mean events, webinars, conferences, meet-ups, organized by the Host for an identified group of Participants), collectively.

Event Content shall mean any content of an Event, (verbal, written or in audio-visual form), including material, performance, presentation, reports, graphics, sounds, information, and data such as messages or files used or shared or communicated while hosting the Event in case of a Host and/or while participating in an Event, in case of a Participant, as may be applicable.

Host(s) shall mean companies, businesses, organizations, (including authorized representatives of such companies, businesses, organizations) and individuals, who are registered on the Platform and who use the Platform to organize and host their Events.

Participants shall mean individuals including authorized representatives of companies, businesses, organizations registered on the Platform, desirous of attending/attending an Event and shall include any person invited by the Host to speak at an Event or exhibit or present at an Event.

What information do we collect?

We collect and process personal data about you when you interact with us, through the Platform.

This includes:

- full name, nickname, image (profile picture), e-mail address, residential address (including post code, city, country), mobile/telephone number, login details (including username), title or designation and name of the organization you work for, if applicable, any messages entered through chat function (asking questions, participating in live chats, raising hand etc.);
- tracking information such as, but not limited to the IP address of your device and device ID when connected to the internet (including the operating system), your browser information, time zone setting and location, internet service provider, type of camera, microphone or speakers and other information associated with your interaction with the Platform such as details of your Platform usage for analytics, your browsing behaviour and the pages you visit or the Events you attend that are hosted on our Platform (including duration, participation/engagement, join and leave time), whether you are a repeat or new attendee, which virtual table you were assigned to and the number of virtual tables you visited, whether you clicked on any links provided by the Host or on the resources added inside the booth and the number of times you played banner videos;

- your pre-recorded videos, photos and other content that you display during Events and Platform functionalities you use during Events, your correspondences with Airmeet, emails, testimonials, networking tables, postings, reviews, chat rooms, feedback and survey responses;
- information related to the browser or device you use to access our Platform.
- if you are a Host, we also collect your marketing preferences, including any consents you have given us.

What information do we receive from third parties?

Sometimes, we receive information about you from third parties. In particular: from social media providers such as Facebook, LinkedIn, Twitter, or Google when you login in to PRI using your login details from such providers. Where you link your LinkedIn profile to your PRI account, we may receive information from your LinkedIn profile as well.

How do we use this information, and what is the legal basis for this use?

We process this personal data for the following purposes:

- To fulfil a contract, or take steps linked to a contract. This includes:
 - creating and managing your account including verifying your identity and email address;
 - communicating with you about the Services; and
 - providing Services and support and assistance related to the Services.
- As required by PRI to conduct our business and pursue our legitimate interests, in particular:
 - we will use your information to provide access to the Platform and Services you have requested for, and respond to any comments, inquiries, or complaints you may send us;
 - we monitor use of our Platform and Services, and use your information to help us monitor, maintain, develop, improve, and protect our Platform, content, Services, both online and offline;

- we monitor customer accounts to prevent, investigate and/or report fraud, illegal or harmful actions, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law and to maintain safety, security and integrity of the Platform and/or the Services;
- we use information you provide to investigate any complaints received from you or from others, about our Platform or Services and to resolve such complaints and to enforce our Terms;
- we will use data in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation); and
- we use data of some individuals to invite them to take part in market research.
- Where you give consent:
 - we will send you direct marketing communication in relation to our relevant offers, features and Services, or other services provided by us, our affiliates and carefully selected partners where we think you may be interested in them;
 - we record events that are hosted by you, on your behalf. If you do not wish any Event to be recorded, we request you to disable the feature of recording immediately when you start or during an Event;
 - we place cookies and use similar technologies in accordance with the “Cookies” section in this policy and the information provided to you when those technologies are used;
 - we use information you provide to perform data analysis, analyze trends, internal research for technological development of the Platform;
 - we use information you provide to personalize our Platform content and communications, and Services for you and to enhance your experience of using the Platform and Services; and
 - on other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time.
- For purposes which are required by law:

- where we need parental consent to provide online services to children under 16. However, our website is not designed for children under 16; and
- in response to requests by government or law enforcement authorities conducting an investigation.

Relying on our legitimate interests

We have carried out balancing tests for all the data processing we carry out on the basis of our legitimate interests, which we have described above. You can obtain information on any of our balancing tests by contacting us using the details set out later in this Policy.

Withdrawing consent or otherwise objecting to direct marketing

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests. You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the following details: marketing@proximaresearch.com.

Cookies

We use data collection devices such as “cookies” on our Platform. “Cookies” are small files sited on your hard drive that assist us in providing customized services. Cookies can also help us provide information which is targeted to your interests. Our Platform uses session cookies to ensure that you have a good experience. These cookies contain a unique number, your ‘session ID’, which allows our server to recognize your computer and ‘remember’ what you’ve done on the Platform. The benefits of this are:

- You only need to log in once if you’re navigating secure areas of the Platform.
- Our server can distinguish between your computer and other users, so you can see the information that you have requested.

You can choose to accept or decline cookies by modifying your browser settings if you prefer. This may prevent you from taking full advantage of the Platform. We also use various third-party cookies

for usage, behavioural, analytics and preferences data. The following are the cookies used on the Platform:

1. Necessary cookies: To identify the user and share the content that he or she requested for.
2. Analytics cookies: We use these cookies to help us to understand how you make use of our content and work out how we can make things better. These cookies follow your progress through the anonymous data collected by us on where you have come from, which pages you visit, and how long you spend on the site. These cookies only reveal anonymised information to us.
3. Functionality cookies: For the customized user experience and resuming past course progress.
4. Tracking and optimization cookies (including marketing cookies): To capture usage metric on the device, operating system, browser, etc. To capture behavioural metrics for better content delivery.

Who will we share this data with, where and when?

We will share your personal data with UKRKOMEXPO LLC, which is our group entity, for business development purposes.

As part of an Event, since the Platform facilitates connection between users, your following personal data is shared with other attendees or Participants of the Event:

1. First and last name
2. Profile picture
3. Designation
4. Organisation
5. City
6. Country

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

Personal data will also be shared with third party service providers, who will process it on behalf of PRI for the purposes identified above. In particular, we use third party providers of website hosting, subscription management, maintenance, content delivery and security services, data storage, providers of session recording service, application and infrastructure monitoring tools auditing, CRM tool providers, chat communication and interactive streaming platform providers, data analysis, and assistance with delivery of relevant marketing messages and advertisements and to prevent, detect, mitigate, and investigate fraudulent or illegal activities related to our Services.

In the event that the business or any portion thereof is sold, transferred, merged, divested or integrated with another business, your details will be disclosed to our advisers and any prospective purchaser and their adviser and will be passed to the new owners of the business.

Please note that any Event Content or personal data that you share or upload during any Event, either as a Participant or as a Host, accessing any of the interactive features on the Platform, including turning on your video camera or audio feature on the Platform or a message or a chat sent by you or content shared by you, can be viewed by other users participating in that Event.

Information shared by Participant directly with Host

The Host may request for certain information of the Participant during an Event organized by the Host which is in addition to the information obtained by the Platform. Please note that the Hosts are the controller of such data, and you should refer to their privacy policies (notices) for understanding how they use your personal data.

Depending on the location of the Event's Host, your data may be transferred to other countries.

Where information is transferred outside the EEA, and where this is to a stakeholder or vendor in a country that is not subject to an adequacy decision by the EU Commission, data is adequately protected by EU Commission approved standard contractual clauses or a vendor's Processor Binding Corporate Rules. A copy of the relevant mechanism can be provided for your review on request to PRI using our contact details below.

What rights do I have?

You have the right to **ask us for a copy** of your personal data; to **correct, delete or restrict** (stop any active) processing of your personal data; and to **obtain the personal data you provide to us for a contract or with your consent in a structured, machine-readable format**, and to ask us to **share (port) this data to another controller**.

In addition, you can **object to the processing** of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, where they would infringe the rights of a third party (including our rights) or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. Relevant exemptions are included in both the GDPR and in the Data Protection Act 2018. We will inform you of relevant exemptions we rely upon when responding to any request you make.

To exercise any of these rights, or to obtain other information, such as a copy of a legitimate interests balancing test, you can get in touch with us using the details set out below. If you have unresolved concerns, you have the **right to complain** to an EU data protection authority where you live, work or where you believe a breach may have occurred.

If you believe that we have infringed your rights, you have the right to complain about our processing of your Personal Data to the relevant data protection authority. You can complain in the EU member state where you live or work, or in the place where the alleged breach of data protection law has taken place.

For registering on the Platform by setting up and creating an account and to attend events, you will be required to provide us with certain mandatory information, which we will indicate in the form/ against the fields of information to be filled by you: if relevant data is not provided, then we will not be able to let you create an account, attend the Events or provide you with the Services you requested, as the case may be. All other provision of your information is optional.

How long will you retain my data?

We generally retain your personal data as long as you keep your account open or as needed to provide you Services and for a period of 5 (five) years after you have requested that your account is closed or if it's been inactive for 5 (five) years. This includes data you or others provided to us and data generated or inferred from your use of our Services.

Where we process personal data for marketing purposes or with your consent, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to process your data so that we can respect your request in future. In case you're a Host and we process your personal data for marketing purposes, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data, so that we can respect your request in future. Where we process personal data in connection with performing a contract or for a competition, we keep the data for 6 (six) years from your last interaction with us.

In addition, if it is required by the legislation of the country of your nationality, your data will be collected, processed and stored in accordance with the legislation in force in that state. In particular, if the obligation to store your data on the territory of this state is legally established in the country of your nationality, we ensure that such conditions are met on our part.

How to contact us

If you have any questions about our privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Email us at: marketing@proximaresearch.com

Call us: +38 (044) 585-9710

Or write to us at: Ukraine, Kiev, ave. Bazhana, 10A

Changes to our Privacy Policy

We review our Privacy Policy regularly and post any updates on this web page. We monitor changes in legislation regarding personal data in the countries of the European Union and the member states of the CIS and the EAEU.

This Privacy Policy was last updated on January 1, 2022.

