

Privacy Policy

This Privacy Policy contains the provisions applicable to this website of the Company <http://pepper.partners>. The controller and processor of the personal data of the users of this website is Peppergroup OÜ (hereinafter referred to as the "Company" or "we"), with the office is located at: Harju maakond, Tallinn, Kesklinna linnaosa, Estonia pst 5 - 309b, 10143.

Personal Data Subjects are visitors to this website and/or persons who use the functionality of this site (hereinafter referred to as "Users" or "You"). "Company" and "User" are collectively referred to as the "Parties", and separately - a "Party".

This Policy explains how we use and protect any personal data that we collect regarding our users. We follow the principles specified in the EU General Data Protection Regulation (GDPR), which came in force on May 25, 2018, namely: personal data are:

1. processed by us legally, honestly and "transparently" in relation to users;
2. collected for specific, explicit, and legitimate purposes and are not further processed in a manner that is incompatible with the said purposes ("purpose restriction");
3. adequate, appropriate and limited to what is necessary in relation to the purposes for which they are processed ("the principle of data minimization");
4. are accurate and, if necessary, up-to-date; every reasonable step should be taken to ensure that personal data that is inaccurate, taking into account the purposes for which it is processed, is erased or corrected without delay ("accuracy");
5. stored in a form that allows users to be identified for no longer than is necessary for the purposes for which personal data is processed; ("storage restriction");
6. processed in a manner that ensures proper protection of personal data, including protection against unauthorized or illegal access, as well as against accidental loss, destruction or damage using appropriate technical or organizational measures ("integrity and confidentiality"). The list of information that is collected and processed by the Company in relation to users includes the following: contact information, valid email addresses, relevant payment information, and login (username). The company may request a scanned copy of the User's passport in order to verify their identity.

All information you provide must be correct and valid. You are personally responsible for the accuracy, completeness and correctness of the information provided by you. We use your personal data to verify the User's identity when registering on our site, to verify your identity in order to ensure proper payments by the user of the Company and by the Company to the User. We use your payment information (such as the cardholder's full name, credit card number, and card expiration date) to provide you with services on our site.

We use your personal data for the following purposes: to provide you with our services; to maintain your account and records; to communicate with you as part of the provision of the services; to provide answers to your questions and comments; to monitor the dynamics and levels of use of our site and the quality of our services; to determine your interest in our services; to improve the quality of the services and our website; to notify you of our special offers and services that may be of interest to you; to determine your experience on our site; to obtain information from you, including through surveys; to resolve disputes; to charge fees (well-grounded); to eliminate problems and correct errors on our site; to prevent potentially prohibited or illegal activities in order to ensure compliance with our Terms of Service and our Policies.

Disclosure of your personal data.

Your personal data may be disclosed (transferred) for the purposes described above, by the Company, to any of our affiliates or business partners (regardless of their geographical location). We hereby guarantee that such companies are aware of the proper processing procedures of personal data, in accordance with the EU General Data Protection Regulation (GDPR), which came in force on May 25, 2018, and comply with the provisions of the said Regulation. We and the companies mentioned above may from time to time engage third parties to process your personal data for the purposes specified above, provided that such processing is governed by a contractual relationship in the form specified by applicable legislation. If required or permitted by law, your personal data may also be disclosed to corresponding government, regulatory or executive authority.

Rights and Obligations of the Parties.

The User may:

1. require the Company to correct, block, erase and/ or delete personal data, or provide the Company with objections to such processing by making a corresponding request to the Company's Customer Support. Under certain circumstances, your request may be processed for an additional small fee to cover associated administrative costs;
2. provide incomplete personal data to the Company (subject to the provision of an additional statement explaining the reasons);
3. specify the processing limit in case of one of the following events takes place:
 - the accuracy of the personal data is disputed by you during the period that allows the Company to verify the accuracy of the personal data;
 - the processing is illegal, and you oppose the erasure of personal data and instead require restrictions on their use;
 - The Company no longer requires personal data for processing purposes, but it is required by you to establish, implement or comply with legal requirements;
 - You objected to the processing of your personal data before checking the legal grounds for the processing of such data by the Company;
4. request and receive personal data about you that you have provided to the Company in a structured, commonly used and machine-readable format by making a corresponding request and transmit these data to another controller without interference from the Company;
5. be informed whether the Company stores any information about you;
6. request from the Company the exact purpose (s) of the processing and the categories of your personal data that are processed by the Company;
7. request access to you personal data that the Company maintains;
8. request the estimated period during which your personal data will be stored by the Company, and, if this is not possible, the criteria according to which the storage period of such information is determined.

The User shall:

1. provide their accurate, truthful and complete personal data, in accordance with the Terms of Service posted on our website and this Policy;

2. immediately provide the Company with their updated personal data in the event of any changes in the manner specified in the section "Access, Correction, Erasure and Deletion of Data" hereof;
3. immediately notify the Company of the fact of unauthorized receipt by a third party of their personal data, if the User becomes aware of such a fact;
4. notify the Company if the User disagrees with any of the purposes of data processing or intends to stop processing their personal data by the Company by submitting a corresponding application to the Company's Customer Support. The User is fully aware that provision of a notification on disagreement with any of the purposes of processing personal data by the Company and/or of the intention to stop processing their personal data is the grounds for terminating the relationship between the Parties under the Terms of Service posted on this site. You are solely responsible for the truthfulness, accuracy and relevance of your personal data provided to the Company.

The Company may:

1. terminate the contractual relationship with you under the Terms of Service posted on the Company's website, if you fail to provide your consent to the processing of your personal data for the purposes specified hereunder;
2. introduce changes to the terms of this Policy unilaterally without prior consent from you.

The Company shall:

1. The Company shall notify you about any alteration or erasure of personal data, or restriction of the processing of the User's personal data of each third party who previously received the User's personal data from the Company in respect of the data processing purposes specified hereunder unless this is impossible or requires the use of incommensurable efforts by the Company;
2. notify the User about the recipients of their personal data (third parties), if the User submitted a corresponding request;
3. at the request of the User, provide the User in a structured, commonly used and machine-readable format their personal data, which is stored by the Company;
4. in the event of an unauthorized disclosure of the User's personal data, notify the supervisory authority within 72 hours from the moment the Company becomes aware of the fact of unauthorized disclosure. If it is not possible to notify the supervisory authority within 72 hours, the Company shall notify the supervisory authority of the reasons for the delay in notification;
5. immediately notify the User of the unauthorized disclosure of their personal data in case that such disclosure may pose a threat to the rights and freedoms of the User. The Parties also have all the rights and obligations specified by the General Data Protection Regulation. The terms of storage of the personal data received by the Company cover the entire period of the relationship between the Parties defined by the Terms of Service posted on the Company's website, as well as during the next three years following the date of termination of the relationship between the Parties (in order to resolve possible disputes).

Legal Protection

If you would like to review any of your personal information that we maintain, or if you would like to alter or delete your personal data, or if you would like to receive information about how your personal data are used, or how we ensure the confidentiality of your personal data, you may submit a corresponding request to us. Such a request must be submitted by you to the Company in writing, and must also contain your name, address, and a description of the information that you wish to review/alter or delete. This request

may be submitted by you to the Company's Customer Support or by mail to the following address: Harju maakond, Tallinn, Kesklinna linnaosa, Estonia pst 5-309b, 10143. In order to maintain confidentiality, when submitting a request, you will also need to submit a confirmation of your identity. For this purpose, you must attach a copy of your passport to the request. We reserve the right to charge a reasonable fee for repeated requests, requests for additional copies of the same data, and/or requests that are considered generally unreasonable or excessive.

We may also refuse to respond to requests that we deem to be generally unreasonable or excessive.

Cookies, Tags and Other Identifiers.

Cookies are text files located on your computer or mobile device in order to collect standard information in the online log and information about the behavior of visitors. Our websites create cookies for each visiting session.

We use cookies for the following purposes:

- to ensure that any actions you perform on our website are recorded;
- to analyze the traffic on the Company's website in order to make improvements.

Please note that this website cannot be used without cookies. If you require more information about the purposes of the Company's use of cookies, please, submit a corresponding request.