

Privacy Policy

Last Updated: August 22, 2025

At Mesilat LTD, we are committed to protecting your personal data and respecting your privacy rights. This Privacy Policy outlines how we collect, process, and secure your personal data, meaning any information relating to an individual (hereinafter the "Client", "you", or "User") that can uniquely identify them (hereinafter "Personal Data"). Our data processing practices fully comply with applicable data protection laws, including Regulation (EU) 2016/679, known as the General Data Protection Regulation ("GDPR"), and the laws of the Republic of Cyprus.

This Privacy Policy reassures our Clients of the robust measures we implement to safeguard their Personal Data. We value the trust you place in us when sharing your information and are dedicated to maintaining its security and integrity.

Unless otherwise specified, terms used in this Privacy Policy shall have the meanings defined in our Terms and Conditions.

This Privacy Policy primarily applies to our Clients and prospective customers. If you are an employee, contractor, or service provider associated with Mesilat LTD, your personal data processing is governed by your employment or contractual agreement or separate policies. For further details, please contact us using the information in the **Contact Details** section below.

I. Who We Are

We operate the Mesilat Platform (hereinafter the "Platform"), a comprehensive set of services facilitating the online sale of goods or services through various digital systems, including the Mesilat website, its subdomains, user interfaces, mobile applications (iOS, Android), APIs, social media integrations, and other designated web resources (hereinafter the "Website"). Mesilat LTD, a company incorporated under the laws of the Republic of Cyprus (registration number: HE 444113, registered address: 12 Nikolaou Lazarou Street, 304, 3020, Limassol, Limassol, Cyprus), acts as the data controller responsible for the Personal Data you provide during account registration or while using services offered through the Website.

References to "Mesilat LTD", "we", "us", or "our" in this Privacy Policy denote Mesilat LTD, the entity managing and processing your data when you interact with our Website. Your privacy is paramount, and we are committed to ensuring the security of the information you share.

We maintain stringent data protection standards, regularly reviewed and updated to ensure the confidentiality, integrity, and availability of your Personal Data. Our approach integrates legal, administrative, and technical safeguards, informed by annual risk assessments. We uphold strict confidentiality of your private information, sharing it only with your written consent, unless required by law, necessary for identity verification, or essential to fulfill our contractual obligations. Personal Data is processed by our dedicated team and select trusted third parties providing specific services related to your Account and our offerings. All Personal Data is stored securely, both electronically and physically, in compliance with applicable laws.

II. Data Usage

We may collect, use, store, and transfer various categories of data about you, including:

- **Identity Data:** First and last name, patronymic (if applicable), date of birth, gender, passport, ID, driver's license number, and photographs.
- **Contact Data:** Billing address, email address, and phone numbers.
- **Financial Data:** Bank account details, payment card information, and other payment details based on your chosen payment method. Note that most financial data is held by our payment processor; we recommend reviewing their privacy policy for details.
- **Transaction Data:** Information about transactions, account balances, deposit and withdrawal amounts and methods, and other interactions on our Website.
- **Content Data:** Photographs, videos, or other digital media uploaded to our Website that may contain identifiable information.
- **Technical Data:** IP address, login credentials, browser details, geolocation data, browser extensions, pages viewed, features used, operating system, and other device-related data, including cookie data.
- **Profile Data:** Account details, username, password, interests, professional specialty, feedback, survey responses, and interactions related to our services.
- **Usage Data:** Details of your Website activities, including registration date, account type, activity history, number of complaints, filed requests, and IP history.
- **Marketing and Communication Data:** Preferences for receiving marketing communications and communication methods.
- **Special Categories of Data:** If voluntarily provided, data concerning race, ethnicity, religious beliefs, interests, preferences, political opinions, health, or genetic and biometric data. We do not collect data on criminal convictions or offenses.
- **KYC Data:** Identity document details, including recent utility bills, Identity Card, Passport, Driver's License, and Tax Identification Numbers (TIN).
- **Location Data:** Information about your geographical location when interacting with our Website, including country of residence, time zone, and interface language.
- **Audio Data:** Full voice recordings of calls you initiate or receive from us.

Aggregated Data: We may use statistical or demographic data derived from your Personal Data, which does not directly or indirectly identify you. For example, we may analyze Usage Data to calculate the percentage of users engaging with specific Website features. If such data, when combined, identifies an individual, we treat it as Personal Data per our policies. We process data with transparency, fairness, and adherence to principles of data minimization, accuracy, and limited storage.

We collect and process Personal Data primarily to:

- Fulfill our contractual obligations to you;
- Comply with legal and regulatory requirements;
- Protect our legitimate interests, provided they do not override your rights.

If you fail to provide requested data, it may hinder our ability to deliver certain services, potentially leading to service termination. We will notify you if this occurs. You are responsible for keeping your data accurate and up-to-date, and we encourage you to inform us of any changes. While we strive to ensure data accuracy, we rely on your updates and are not liable for inaccuracies absent your input.

III. How Is Your Personal Data Collected

We collect your data through various methods, including:

Direct Interactions: You provide most data directly when:

- Registering an account on our Platform;
- Engaging with our services;
- Purchasing products or services;
- Subscribing to updates or publications;
- Opting into marketing materials;
- Providing feedback or requesting notifications;
- Contacting us with inquiries.

Automated Technologies: Your device automatically shares technical details during interactions, such as IP addresses, cookies, browser and operating system details, access times, and page requests, to optimize Website performance and user experience. We use web analytics tools and cookies to track performance and user engagement sources, refining our marketing and enhancing usability. You may stop such data collection, where feasible, by contacting us at the details below, using your registered email. We aim to process such requests within 30 business days.

Cookies and Automatic Data Collection: Cookies are small data files with unique identifiers stored on your device to monitor site usage. Your browser restricts access to cookies sent by our Website, protecting your privacy. Cookies track traffic patterns anonymously, identifying repeat visitors and popular pages without storing personal details like names or emails. You may configure your browser to reject or delete cookies, but this may limit access to some Website functions.

Third Parties or Public Sources: We may collect data from third parties, such as business partners, affiliates, subcontractors for technical, payment, or delivery services, advertising networks, analytics providers, or search information providers, including data from websites using our cookies.

User Contributions: You may submit Content Data for publication or sharing on public Website sections or with other Users or third parties. You assume responsibility for such submissions, acknowledging inherent risks. While privacy settings are available, no security measures are infallible, and we cannot control other users' actions or guarantee protection against unauthorized access to your Content Data.

IV. Purpose for Which We Will Use Your Data and on What Legal Basis

We process your data in compliance with GDPR and Cyprus data protection laws to:

- Fulfill contractual obligations;
- Provide efficient services;
- Meet legal and regulatory requirements.

Legal Basis:

- Compliance with legal obligations;
- Execution of contracts with you;
- Protection of our legitimate interests, provided they do not override your rights;
- Your explicit consent, where applicable.

Below is a table outlining how we use your data, the types involved, and the legal basis, including legitimate interests where applicable:

Purpose/Activity	Type of Data	Lawful Basis for Processing
a. Account activation, notifications of policy changes, secure identification, age verification, and participation in Website features	Identity Data, Profile Data, Contact Data, KYC Data, Financial Data	Performance of contract, legal obligations
b. Verify location information accuracy	Profile Data, Location Data, Content Data, Usage Data	Performance of contract, legal obligations
c. Secure authentication via social network protocols	Technical Data	Performance of contract, legal obligations
d. Process transactions and requests	Financial Data, Transaction Data	Performance of contract, legitimate interests
e. Administer and protect our business and Website (e.g., troubleshooting, data analysis, maintenance, fraud prevention)	Identity Data, Contact Data, Technical Data, Content Data	Performance of contract, legal obligations, legitimate interests (ensuring a safe environment, IT services, network security)
f. Deliver relevant content/advertisements, optimize Website performance, enhance customer experience	Identity Data, Contact Data, Profile Data, Usage Data, Technical Data, Marketing and Communication Data	Performance of contract, legitimate interests
g. Study usage patterns for product development and marketing	Transaction Data, Content Data	Legitimate interests (business growth, statutory limitations)
h. Notify about new services, features, or updates	Identity Data, Profile Data, Contact Data, Technical Data, Usage Data, Transaction Data, Marketing and Communication Data	Performance of contract, legitimate interests (product development, business growth)
i. Send direct marketing, newsletters, or notifications (no third-party marketing)	Identity Data, Profile Data, Contact Data, Website activity data, Marketing and Communication Data	Performance of contract, legitimate interests (personalized services)
j. Optimize Website usability and marketing efficiency	Location Data, Technical Data, Usage Data, Marketing and Communication Data	Performance of contract, legitimate interests (personalized services)
k. Monitor employee training, resolve disputes, prevent fraud, improve service quality	Audio Data, Content Data	Performance of contract, legal obligations, legitimate interests

If you are a Client with a valid reason for engagement or have provided consent, we may use your data for support communications, newsletters, push notifications, or calls to inform you about features, updates, or services. We may also send marketing related to our services via email or other means, but never for third-party marketing. Our Website is for users aged 18 and above, and we do not knowingly collect data from minors. We collect your birthdate to verify age and will delete any data inadvertently collected from individuals under 18. Contact us at support@mesilat.com if you suspect such collection.

V. Opting Out

To stop receiving marketing newsletters, sharing data with third parties for marketing, or update notifications, email support@mesilat.com from your registered Account email, requesting cessation of such communications. We will process your request within 7 business days, halting promotional content delivery.

VI. Disclosure of Data

We may share your data with third parties for the purposes outlined above, ensuring compliance with GDPR and Cyprus laws. Third-party processors are contractually bound to process data only per our instructions and GDPR standards, preventing use for their own purposes.

External Third Parties:

- **Service Providers:** Trusted providers managing IT systems, payment solutions, statistical analysis, marketing, newsletters, or customer support on our behalf.
- **State Authorities:** Data may be shared with authorities if required by law, regulation, or court order, to the minimum extent necessary.
- **Other Disclosures:** Data may be shared with your consent, for transaction processing, or to protect our rights, property, or users, including in legal claims or fraud prevention.

Third-Party Safeguards:

- Signed GDPR-compliant agreements;
- Non-disclosure or confidentiality agreements;
- Procedures ensuring data protection compliance.

International Transfers:

Data may be transferred to Third Countries outside GDPR scope under:

- Standard Data Protection Clauses (GDPR Article 46(2));
- Binding Corporate Rules (GDPR Article 47).

Transfers occur only if:

- You consent explicitly;
- Necessary for contract execution or pre-contractual measures;
- Required for contracts in your interest;
- Justified by public interest or legal claims;
- Mandated by law;
- Essential for your vital interests;
- Governed by a data transfer agreement.

If a third party misuses your data, we will take remedial action. Contact us at the details below for transfer-related inquiries.

VII. Data Retention

We retain your data only as long as necessary to fulfill its collection purposes, including legal, tax, or accounting obligations. Data may be retained longer if a complaint is received or

litigation is anticipated. Retention duration considers data quantity, type, sensitivity, risks of unauthorized access, processing objectives, and legal requirements.

Data is retained for at least 5 years to provide services, pursue lawful business purposes, or as permitted by law. Upon expiration, data is irreversibly destroyed, and we notify third parties to do the same.

VIII. Your Rights and How to Withdraw Consents and Unsubscribe

You are responsible for providing accurate, up-to-date identity information, notifying us of changes within 7 calendar days. If your data is inaccurate, contact our support team.

Under GDPR and Cyprus law, your rights include:

- **Right to Access:** Confirm whether we process your data, access details, or obtain a copy.
- **Right to Rectification:** Correct or complete inaccurate or incomplete data.
- **Right to Erasure:** Request data deletion if no longer needed, subject to legal constraints.
- **Right to Restrict Processing:** Restrict processing if data is inaccurate, unlawful, no longer needed but required by you, or pending verification of objections.
- **Right to Data Portability:** Receive data in a structured, machine-readable format if processed by consent and automated means, unless it impacts others' rights or is infeasible.
- **Right to Object:** Object to processing based on legitimate interests, subject to our overriding reasons.
- **Right to Withdraw Consent:** Revoke consent for processing (e.g., marketing), without affecting prior processing legality.
- **Right to Complain:** Contact the Office of the Commissioner for Personal Data Protection in Cyprus if dissatisfied.

To exercise these rights, contact us using the details below, providing your full name and email for identification. We may request additional verification to ensure data security. We aim to respond within one month, with extensions for complex or multiple requests. Excessive or unreasonable requests may incur a nominal fee.

IX. Data Security and Usage

Security Protocols: We implement robust measures to prevent accidental loss, unauthorized access, alteration, or disclosure of your data. Access is restricted to employees, agents, contractors, or third parties with legitimate business needs, bound by confidentiality.

Data Breaches: We have procedures to address suspected breaches, notifying you and the Office of the Commissioner for Personal Data Protection as required.

Account Security: Upon registration, select a unique username and password. Never share these details publicly. We will not request your password. Notify us immediately at support@mesilat.com if you suspect unauthorized access. We are not liable for misuse of shared credentials.

Infrastructure Security: Data processing equipment is housed in secure data centers with network segmentation and role-based access controls.

Threat Management: We proactively monitor and mitigate threats, vulnerabilities, and malware to protect your data.

Data Recovery: Backup and recovery systems ensure data restoration in case of disruptions, with critical databases in high-availability mode.

Employee Training: Employees with data access are trained regularly, with access granted on a need-to-know basis.

Consequences of Not Providing Data: Failure to provide required data may prevent us from fulfilling contractual obligations, potentially leading to service cancellation. Keep your data accurate and updated.

Automated Decision-Making and Profiling: We generally do not use automated decision-making. If profiling occurs, you will be informed. Optional data collection is clearly indicated.

X. Contact Details

Data Controller: Mesilat LTD, responsible for your data processing. Contact us at:

Address: 12 Nikolaou Lazarou Street, 304, 3020, Limassol, Limassol, Cyprus

Email: support@mesilat.com

Data Protection Officer (DPO): Our DPO oversees this Privacy Policy. Contact them at:

Address: 12 Nikolaou Lazarou Street, 304, 3020, Limassol, Limassol, Cyprus

Email: dpo@mesilat.com

Use your registered email for requests, and we may require identification for security. For further inquiries or concerns, contact the Office of the Commissioner for Personal Data Protection in Cyprus.

XI. Links to External Websites

Our Website may include links to third-party websites not under our control. We are not responsible for their data collection or privacy practices. Review their terms and privacy policies before sharing data.

XII. Updates to This Privacy Policy

Last Updated: August 22, 2025

We may update this Privacy Policy to reflect changes in our data practices. Updates are effective upon posting on our Website and may be supplemented by other relevant terms. For feedback or inquiries, contact us using the details above.