

## Personal Data Processing Policy (Privacy Policy)

April 25, 2026

This Personal Data Processing Policy (hereinafter referred to as the "Policy") is prepared by the Administration of <https://ggssel.net/> (hereinafter referred to as the "Service") and defines the terms and conditions for the collection, use, and other processing of the Users' personal data.

This Policy is a legally binding document for all Users utilizing the Service in accordance with its intended purpose. Each User is required to familiarize themselves with this Policy prior to beginning use of the Service.

Acceptance of this Policy is carried out by the User through conclusive (implied) actions demonstrating that they have read and accepted the Policy, namely through the use of the Service. Such actions confirm the User's intention, will, and consent to comply with and be bound by the terms of this Policy.

Acceptance of the Policy signifies that the User has read and understood all of its terms—both collectively and individually—and fully, unconditionally, and irrevocably agrees to its provisions and requirements, thereby undertaking the obligation to strictly comply with all rules established herein.

The Service Administration and the User are hereinafter collectively referred to as the "Parties", and individually as a "Party."

### 1. Terms Used in the Policy

1.1. For the purposes of this Policy, the following terms shall have the meanings set forth below:

1.1.1. Service – a set of information and technical solutions hosted on the Internet at <https://ggssel.net/>, providing the ability for direct interaction and the organization of transaction execution between a Seller and a Buyer, as well as the facilitation of secure settlements between them.

1.1.2. User – an individual accessing the Service for the purpose of obtaining services from the Service Administration, specifically as a Seller or a Buyer.

1.1.3. Personal Data – any information relating to an identified or identifiable natural person (personal data subject), either directly or indirectly.

1.1.4. Processing of Personal Data – any action (operation) or series of actions (operations) performed with or without the use of automated means on personal data, including collection, recording, systematization, accumulation, storage, clarification (updating or modification), retrieval, use, transfer (distribution, provision, access), anonymization, blocking, deletion, or destruction of personal data.

1.2. The Policy may include terms not defined in clause 1.1 of this Policy. In such cases, the interpretation of these terms shall be made in accordance with other legal documents published on the Service, as well as based on the text and meaning of this Policy.

1.3. In the absence of an unambiguous interpretation of a term in this Policy and in the Public Offer, the following order of interpretation shall apply:

first, according to the terminology used within the Service and in other legal documents published thereon;

second, in accordance with the applicable law and business customs in the relevant field of activity.

### 2. Purpose of the Policy. Objectives, Methods, and Legal Basis for the Processing of Personal Data

2.1. The purpose of this Policy is to ensure the proper protection of Users' Personal Data from unauthorized access by third parties, as well as to establish the procedures for the collection, provision, and use of Users' Personal Data.

2.2. The purposes of Processing Users' Personal Data include:

- the fulfillment by the Service Administration of its obligations toward the User, as provided in the User Agreement (Public Offer) published on the Service;
- facilitating the conclusion of Transactions between Users (Sellers and Buyers);
- facilitating settlements between Users (Sellers and Buyers);
- providing the User with the ability to use the Service in accordance with its intended functionality and purpose;
- generating anonymous and aggregated statistics on Service usage to improve user support, enhance Service performance, accommodate user preferences, prevent fraud, and analyze operational efficiency.

2.3. The Service Administration's primary objective and condition for its activities is the observance of human and civil rights and freedoms during the Processing of Personal Data, including the protection of the right to privacy and to the confidentiality of personal and family life.

2.4. Personal Data is processed by the Service Administration using the methods listed in clause 1.1.4 of this Privacy Policy, in accordance with the purposes established in this section.

2.5. The legal basis for the Processing of Users' Personal Data is the User's explicit consent to such Processing, provided through acceptance of this Policy.

### 3. Users' Personal Data

3.1. The Service Administration processes and/or may process the following categories of Users' Personal Data — information necessary for the use of the Service. The purposes of processing such Personal Data are specified in clause 2.2 of this Policy.

3.2. The Personal Data specified in clause 3.1 of this Policy is processed by automated means (via computer or server).

3.3. When a User uses the Service, the Service Administration also automatically receives encrypted data (which does not allow for the identification of the User or the linking of actions to a specific User) from software, technical, and hardware tools used by the User to access the Service's webpages. This includes, but is not limited to:

- information about the hardware and software devices used by the User to access the Service, such as the model and version of the operating system, unique device identifiers, and mobile network data;
- information recorded in server logs, including search queries, cookies, IP address, system errors, cookie data, and records of which Service webpages were visited;
- information about the User's geographic location provided via the Internet;
- information about the User's provider's domain (or subdomain), country of access, and related data.

The purpose of processing such Personal Data is to generate anonymous and aggregated statistics on Service usage to ensure effective user support, improve Service performance, adapt to user preferences, prevent fraud, and analyze Service functionality.

3.4. The placement of Personal Data on the Service and its provision to the Service Administration by the User is intended to fulfill the mutual obligations between the Service Administration and the Users under the agreements referenced in clauses 2.2 and 2.5 of this Privacy Policy.

3.5. The use of Users' Personal Data is carried out solely for the purposes specified in Sections 2 and 3 of this Policy and is not permitted for any other purposes unrelated to the scope of the Service.

3.6. The Service Administration undertakes not to provide any Users' Personal Data to individuals or organizations that request it for improper use — including for the purposes of sending unsolicited advertisements, spam, or transferring such data to third parties.

3.7. The Service Administration processes only the Personal Data that has been placed on the Service or directly provided by the User. The processing of Personal Data is performed using the Service's software, hardware, and technical systems, as well as manually when necessary.

3.8. The Service Administration does not process Users' personal data, nor is it responsible for the processing of such data by third parties. In such cases, Users agree to the privacy policies and rules of third-party services regarding the processing of personal data. Should the Service Administration receive requests from competent authorities or in other cases provided for by applicable legislation, the Service Administration is entitled to contact the User or third parties to request the provision of the requested personal data.

#### 4. Notifications and Representations

4.1. The User hereby acknowledges and agrees that the placement of their Personal Data on the Service, as well as its transfer to the Service Administration, is carried out independently, voluntarily, and at their own discretion. By placing their Personal Data on the Service, the User confirms that they do so voluntarily and that they voluntarily provide it to the Service Administration for Processing.

4.2. The User hereby gives consent to the Processing of their Personal Data in accordance with the provisions of the applicable law. The Service Administration is entitled to use the User's Personal Data for the fulfillment of its obligations to the User, including those specified in Section 2 of this Policy, in compliance with the requirements of applicable data protection legislation.

4.3. The User hereby agrees to receive various types of communications from the Service Administration, including SMS messages, email notifications, and other forms of information delivery, including promotional or advertising content.

4.4. Due to the nature of the Service, the Service Administration cannot verify the accuracy of the information provided or received from Users and does not control Users' legal capacity. It is presumed, and the Service Administration proceeds on the basis, that the User in all cases provides complete and accurate information about themselves and keeps such information up to date.

4.5. The Service Administration undertakes not to post the Personal Data of other individuals on the Service and not to use the Personal Data of other Users in any manner inconsistent with applicable law, for unlawful or illegitimate purposes, for personal gain, or for any other purposes unrelated to the objectives of the Service.

#### 5. Disclosure of User Information

5.1. The Service Administration is not entitled, except in the cases specified in clause 5.2 of this Policy, to transfer Users' Personal Data to third parties, whether for compensation or free of charge, without the User's consent.

5.2. The Service Administration may, without the User's consent and without prior notice, disclose User information in the following cases — when permitted or required by law:

- to government authorities, including law enforcement agencies, investigative bodies, or courts, upon a duly substantiated request;
- to third parties pursuant to a court order;
- in any other cases provided for by applicable law.

5.3. The Service Administration may delegate the processing of Personal Data to third parties with the User's consent, unless otherwise provided by applicable law.

#### 6. Measures to Protect User Information

6.1. The Service Administration implements technical, organizational, and legal measures to protect Users' Personal Data from unlawful or accidental access, destruction, alteration, blocking, copying, dissemination, and any other unauthorized actions.

6.2. Such measures include, but are not limited to:

6.2.1. The publication of this Personal Data Processing Policy on the Service.

6.2.2. Appointment of a person responsible for organizing the Processing of Users' Personal Data — this person is the General Director of the Service Administration.

6.2.3. Continuous assessment and control of risks and potential harm that may be caused to the User in the event of a violation of personal data legislation.

6.2.4. Granting access to Personal Data only to those employees of the Service Administration who require it to perform their duties and only for purposes consistent with this Policy.

6.2.5. Recording, systematizing, accumulating, storing, updating (modifying), retrieving, and otherwise Processing Personal Data using databases.

6.2.6. Encrypting Personal Data during transmission and storage.

6.2.7. Conducting regular audits of the data processing system's security.

6.2.8. Using antivirus software and firewalls to protect servers.

6.2.9. The processing (storage) period for all purposes of Personal Data Processing is 3 years from the date of the User's last activity on the Service, or until the purposes specified in clause 2.2 of this Policy have been achieved — whichever occurs first.

The User may withdraw their consent to the Processing of Personal Data at any time by sending a notice to the Service Administration via email at support@ggsel.org with the subject line "Withdrawal of Consent to Personal Data Processing." Personal Data is destroyed by deletion from the Service Administration's servers.

6.3. In the event of a cross-border transfer of Personal Data, the User hereby consents to such transfer. Before initiating any cross-border transfer, the Service Administration must ensure that the foreign country to which the Personal Data will be transferred provides adequate protection of data subjects' rights. Cross-border transfers to countries that do not meet these requirements may only be carried out if the data subject has given written consent to such transfer and/or the transfer is necessary for the performance of a contract to which the data subject is a party.

#### 7. Dispute Resolution Procedure

7.1. The Service Administration and the User hereby agree to a mandatory pre-trial (claim-based) procedure for resolving disagreements and disputes arising from the application of this Policy. The response period to a submitted claim shall be 30 (thirty) business days from the date of its receipt.

7.2. If the parties fail to reach an agreement on disputed issues, any dispute arising from this Policy shall be resolved in court in accordance with the applicable law.

#### 8. User Inquiries

8.1. Users have the right to send requests to the Service Administration, including inquiries regarding the use of their Personal Data, as well as to obtain information that the Service Administration is required to provide under applicable data protection legislation. Requests should be sent to the Service Administration's email address: support@ggsel.org.

8.2. The Service Administration undertakes to review and respond to a User's inquiry within 10 days from the date of its receipt.

8.3. All correspondence received by the Service Administration from Users (in written or electronic form) is treated as confidential and will not be disclosed without the User's written consent. Personal Data and other information about the User submitting the inquiry may only be used for responding to the inquiry or in cases expressly provided for by applicable law.

8.4. The User has the right to obtain information about their Personal Data held by the Service Administration, request corrections, deletion, or restriction of processing, as well as receive information about such processing, in accordance with applicable legislation.

#### 9. Effect of the Policy

9.1. This Policy enters into force from the moment it is published on the Internet on the Service specified in clause 1.1.1 of this Policy.

9.2. This Policy is enacted for an indefinite period and remains in force until it is revoked by the Service Administration.

9.3. In the event of any amendments to this Policy, such amendments take effect from the date of publication of the new version on the Service, unless another effective date is specified at the time of publication. The Service Administration reserves the right to unilaterally make changes to the text of this Policy.

9.4. The User is solely responsible for independently monitoring any changes to this Policy and bears all consequences resulting from failure to comply with this obligation.

9.5. If the User disagrees with the amendments, they must stop using the Service and refuse the services provided by the Service Administration. Otherwise, continued use of the Service shall constitute the User's full acceptance of the updated Policy.

9.6. The current version of the Policy is available in the relevant section of the Service.