



Privacy Policy

Definitions

The following terms should be understood as defined below:

- a) **Guest** - a person who stays on the Administrator's Website using a web browser.
- b) **Customer** - it should be understood as a Service Recipient, Guest, Person interested in the services provided by the Administrator or companies related to the Administrator personally or by capital.
- c) **Interested person** - this is a natural person making a request to the Administrator, a natural person acting on his own behalf and on his own account or a natural person acting on behalf and on the account of the other natural person on the basis of proper power of attorney.
- d) **Service Recipient** - this is an Interested Person who additionally passed the Verification on the Website and was successfully assessed in the same Verification process and started using the Administrator's services.
- e) **Verification** - this is a process consisting of factual activities carried out by the Administrator and Cooperating Entities, consisting in defining and checking the correctness and truthfulness of the data of the Interested Person, in order to assign the status of the Service Recipient to the Interested Person.
- f) **Website** - this is the Administrator's website maintained on the Internet at the address: www.virtualapartment.eu

Who controls your personal data?

According to Art. 13 sec. 1 and sec. 2 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), we inform you that the administrator of the client's personal data is T&S VC OÜ, Pärnu mnt 18, 10141, Tallinn, e-mail address: contact@virtualapartment.com.

In matters of personal data protection, please contact us at the above mentioned e-mail address.

Who do we transfer your personal data to?

The client's personal data may be made available to the Administrator's employees, contractors or associates authorized to process them at the Administrator's request, as well as entities entrusted by the Administrator with the processing of personal data, including entities providing accounting, IT, marketing and organizational services enabling the Administrator to provide services, run a portal preparation and distribution of the newsletter ("Cooperating Entities").

Your data may be transferred to the competent authorities (Police, Prosecutor's Office, Courts) in accordance with the jurisdiction of the conducted proceedings in the scope of their statutory tasks, at their request submitted in accordance with the procedure appropriate for the proceedings and on the basis of a valid decision, judgment or order appropriate for the proceedings, or another decision of an equivalent nature, while maintaining all guarantees ensuring the security of the transferred data.

Your personal data may be transferred to entities from the Administrator's group - that is, entities having capital and personal connections with the Administrator - in particular to the extent necessary for the Administrator to provide services covered by the subject of contracts concluded with the Customer.

In particular, the Administrator exercises due diligence in the selection and choice of the Cooperating Entities, and then, at the stage of concluding a contract with them, makes sure that these entities provide an appropriate level of security with regard to the processing of personal data.

Where do we store your personal data?

We store the collected personal data within the European Economic Area ("EEA"), but it may also be transferred to a country outside this area and processed there. Each operation of transferring personal data is performed in accordance with applicable law, internal procedures of the Administrator's Company and this Privacy Policy.

If the data is transferred outside the EEA, also if, at the Customer's request, the delivery of goods or services is to be delivered outside the EEA, the Administrator applies all available technical measures in relation to countries for which the European Commission has not confirm an adequate level of data protection and processes the data Customer only on the basis of his voluntary consent.

Warranties and statements of the Administrator

The administrator guarantees the protection of personal data and the processing of personal data in accordance with the GDPR. The administrator collects only those data that are necessary for the performance of the contract. The Administrator does not process data without Customer's consent beyond the scope necessary to perform the contract, provide electronic services or the legal obligation incumbent on the Administrator without the Customer's prior consent.

The Administrator takes special care to protect the interests of data subjects; in particular ensures that the data collected by him are processed in accordance with the law; collected for specified, legitimate purposes and not subjected to further processing noncompliant with those purposes; factually correct and adequate in relation to the purposes for which they are processed and stored in a form that allows identification of the persons to whom they relate, for no longer that it is necessary to achieve the purpose of processing.



Due to the nature of the Administrator's services, the Administrator does not process any data of natural persons who are under 18 years of age, or who do not have full legal capacity due to the appropriate ruling on total incapacitation, or who should act through a statutory representative due to partial incapacitation.

On what basis does the Administrator process your personal data?

(1) The processing of personal data is carried out for the following purposes and based on the following legal bases:

1) to the extent that the processing will take place in connection with the Administrator's business and the provision of services to the Customer, i.e. in the scope of receiving and archiving the Customer's declarations of will in connection with undertaking activity on the Website, using the website www.virtualapartment.eu, concluding contracts for the provision of services, in order to perform these contracts or perform contracts for the provision of electronic services, and thus to enable the use of the functionality of the Website and the performance of other electronic services, as well as to perform other contracts to which the customer is a party or to take action at the customer's request before concluding the contract, in order to consider any complaints – **Article 6 Paragraph 1 Letter b of the GDPR;**

2) in the scope of keeping accounting books and settlements for the implementation of the concluded contract, the Administrator processes personal data in connection with the obligations imposed by law, including the Act on tax on goods and services in the field of issuing VAT invoices by the Administrator - **Article 6 Paragraph 1 Letter c of the GDPR;**

3) in order to consider any complaints or reported claims, in the scope of pursuing claims for business activity, for archival (evidence) purposes being the implementation of our legitimate interest in securing information in the event of a legal need to prove facts before the competent state authorities, for analytical purposes (optimization of our products based also on the customer's comments about them and the customer's interest, optimization of service processes based on the course of customer service processes) - in our opinion, the processing of this data is also beneficial for the user, as it improves his experience and allows to offer the user better quality of services - **Article 6 Paragraph 1 Letter f of the GDPR;**

4) after expressing a separate consent pursuant to Art. 6 Para. 1 Let. a of GDPR, in order for us to offer products and services directly (direct marketing), including selecting them in terms of customer needs, sending newsletters in the communication channels provided by the customer (including in the form of text messages/multimedia messages sent to the telephone number provided by the customer) - **only if you give your consent.**



PURPOSE	BASIS OF PROCESSING
<p>1. Performing Verification, including the Customer Verification; point (1) subpoint 1 of the Privacy Policy</p>	<p>The processing of your data is necessary and results from the legal obligations of the Administrator by a number of legal acts - the Estonian Money Laundering and Terrorist Financing Prevention Act passed 26 October 2017, as well as Directive (EU) 2018/843 of the European Parliament and of the Council of 30 May 2018 amending Directive (EU) 2015/849 of the European Parliament and of the Council for the purposes of money laundering or terrorist financing, amending Directives 2009/138/EC and 2013/36/EU, Directive (EU) 2015/849 of the European Parliament and of the Council of 20 May 2015 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, amending Regulation (EU) 2015/1047 of the European Parliament and of the Council, and repealing Directive 2005/60/EC of the European Parliament and of the Council and Commission Directive 2006/70/EC of the European Parliament and of the Council (relevance).</p> <p>The above-mentioned legal acts require the Administrator to perform Customer Verification includes, in particular, determining the identity, as well as duly confirm the address of the Customer's residence, as well as verification of the sources of the Customer finances his activity, which includes the services provided by the Administrator.</p> <p>For the purposes of Verification and making decisions on whether to admit the Customer to the services provided by the Administrator or not, the Administrator does not use tools for the automated management of this process.</p> <p>Customer verification is necessary to enable the Customer to use the Administrator's services. Without the Verification, it would be impossible for the Administrator to provide services to the Customer. The Administrator is obliged to determine the risk associated with the transaction conducted by the potential Customer.</p>
<p>2. Performance of the contract, provision of services to the Customer and the effects of the concluded contract or service; point (1) subpoint 1, 2 and 3 of the Privacy Policy.</p>	<p>The processing of the Customer's data is necessary for the performance of the contract and the provision of services and access to the Website.</p> <p>We believe that we have a legitimate interest to make the necessary verifications in order to provide services and prevent abuse when providing services to the Customer. In our opinion, the processing of the Customer's data is beneficial for all parties involved in the process of making payments for services, in particular for the customer, as it allows us to take appropriate measures to protect the Customer from abuse attempts by third parties.</p> <p>In addition, the Administrator processes personal data regarding the services provided to the Customer to the extent that it is necessary to keep records, to show the facts of purchases made by the Customer before the competent state authorities, and in particular in the performance of obligations under the Estonian Value-Added Tax Act passed 10 December 2003.</p>



<p>3. Customer Service, Improving Products and Services, Website, Quality Analysis - point (1) subpoint 3 Privacy Policy; Cookies Policy.</p>	<p>The Administrator has a legitimate interest in handling requests and inquiries from Customers through various available means of contact. In the understanding of the Administrator, the processing of this data is beneficial for the Customer due to the possibility of its use and the possibility of answering the questions asked by it.</p> <p>When the Customer contacts the Administrator, especially to manage events related to a product/service purchased through the Website, the processing of data is necessary for the performance of the contract for the provision of services.</p> <p>If the Customer's inquiry concerns the exercise of the rights we inform about below, the basis for our services, what authorizes us to process the Customer's data is the request of the Administrator to fulfill the legal obligations incumbent on him.</p> <p>The Administrator has a legitimate interest to conduct a study of the Website's use in order to assess the extent of customer satisfaction, because in his opinion the processing of this data is necessary for the customer. It allows to improve the customer's experience as a user and to improve the quality of services.</p> <p>In addition, in accordance with the Cookies Policy, in order to be able to offer the Customer an electronic service of the highest possible quality technically adapted to his individual needs and to constantly improve the services offered on the Website, we collect cookies in accordance with point 2 based on the Customer's movement on the Website. Cookies are processed automatically. To the extent not covered by the Customer's express consent, it is necessary to improve the quality of services and to provide the Customer with the technical ability to move around the Website.</p> <p>The customer has the right to prevent the Administrator from collecting cookies - details regarding the processing of cookies are included in the Cookies Policy.</p>
<p>4. Marketing - point (1) subpoint 4 Privacy Policy; Cookies Policy</p> <p>All marketing activities are carried out by the Administrator on the basis of your explicit consent with a precisely defined purpose of the Administrator.</p>	<p>The legal basis for the processing of customer data for marketing purposes is the Customer's consent expressed, for example, when you accept receiving information customized to your individual preferences via various communication channels or when you accept the Administrator's participation in a specific promotional campaign or when you accept the cookie settings in point 3 collected by the Website.</p> <p>The Administrator's activities in this regard are aimed at presenting the Customer with information about the Administrator's goods or services, which suits the Customer's preferences.</p>

The Administrator ensures that providing all data is voluntary, but to the extent other than for the purpose of receiving a newsletter or direct marketing (the basis for processing specified in point (1) subpoint 4 Privacy Policy, providing data is necessary to conclude a contract for the provision of remote services and their delivery. Thus, failure to provide personal data or a request to delete personal data or limit the processing of personal data will make it impossible to provide services.

How long does the Administrator store your personal data? ("Processing Periods")

The administrator stores personal data processed for:

1. Guest - the Guest's personal data will be processed until the Guest stays on the Administrator's Website and in the event of consent to the processing of cookies for marketing purposes until the Guest withdraws his consent to such processing.
2. The person concerned - personal data of the person concerned will be processed until the person concerned receives an answer to the inquiry or until the Verification is (a) positive - then the data of the person concerned will be processed in accordance with the processing periods for the Service Recipient, (b) negative - then the personal data of the person concerned will not be further processed.
3. Service Recipient - personal data of the Service Recipient will be processed for the period of providing services to the Service Recipient and until the expiry of the legal obligation based on the Estonian Money Laundering and Terrorist Financing Prevention Act i.e. for a period of 5 years from the end of the last relationship with the Customer in accordance with § 47 of the aforementioned act.

What rights do you have?

The administrator stores personal data on secured servers. Only selected employees and associates indicated above have access to the data. The place and method of storing data is to ensure their full security. Customer rights related to the processing of personal data:

- a. the right to withdraw consent to data processing,
- b. the right to access personal data and receive a copy thereof,
- c. the right to request rectification (correction) of personal data,
- d. the right to request the deletion of personal data,
- e. the right to request restriction of personal data processing,



- f. the right to object to data processing due to a special situation that justifies stopping the procession covered by the objection,
- g. the right to transfer personal data, i.e. the right to receive personal data in a structured, commonly used machine-readable IT format. The right to transfer personal data applies only to data that is processed on the basis of a contract or consent.

In order to use the above rights, the Customer should contact the Administrator. In order to be sure that the person authorized to submit the application contacts the Administrator, the Administrator may ask for additional information allowing for effective authentication and identification.

To the extent that data is processed on the basis of consent, this consent may be withdrawn at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. Consent can be withdrawn by sending a statement of withdrawal of consent to the correspondence address or to our email address.

Cookies policy

1. We use technology that stores and accesses information on a computer or other end device of the user connected to the Internet. We use Cookies. Cookies are small text information about how the Website is used, which are stored on the browser side of the Website visitor, containing data on the user's use of this website. For the same purposes, a space called the local storage of the user's browser is also used, and the provisions regarding cookies also apply to the above-mentioned one. We collect Cookies in three categories, which we describe in detail below.
2. We want to be close to the needs of our customers, which is why we analyze anonymized information on the use of the Website. For this purpose, we use the Google Analytics code. This is a web analytics tool that helps us improve the functionality of the Site. The Google Analytics service collects anonymous information, notes trends on the website without identifying individual Users. Like many other services, the Google Analytics tool uses its own Cookies to analyze the activities of Users. These files are used to store information, e.g. the start time of current visits and whether the User has been to the Website before, from which website he came to the Website, what screen resolution his device is, what products he viewed on the Website, etc. We also use Sumome to create a click map, a scroll map (showing to what point the page visitors scroll), panels for sharing in social media or pop-ups and sidebars with information about discounts/promotions. We also use integration with the Facebook social media channel, which allows you to display Facebook ads to people who have already visited our Sites once.
3. By default, web browsers allow you to store and access Cookies. Each person browsing the Website may, by modifying the settings of their web browser, prevent the saving of Cookies on their device or permanently delete the saved files. You decide on the processing of cookies through the settings of your web browser.
4. By using the Administrator's website without changing the browser settings to disable cookies, the user agrees to place cookies on the device and access to the user's end device. Users can change their web browser settings at any time to disable cookies. The above provision applies to 1st and 2nd category Cookies.
5. The collection, processing and use of category 3 cookies is based on the consent to the processing of data for marketing purposes previously submitted by the Customer. Consent to the processing of category 3 cookies is voluntary and may be withdrawn at any time. Withdrawal of consent does not affect the lawfulness of the processing carried out before its withdrawal.
6. Please be advised that restrictions on the use of Cookies may adversely affect the correctness and convenience of the Website for Customers. The administrator does not ensure full functionality and correct operation of the Website, if you do not consent to the processing of 1st and 2nd category Cookies.
7. Cookies do not constitute personal data such as user's address, password, credit card details, but only data obtained automatically by the website.
8. The Administrator is not responsible for the content or reliability of third party websites.
9. The administrator collects cookies in 3 categories:



Category	Name	Basis of processing	Management	Purpose of processing
<p>First category</p> <p>Withdrawal of consent for processing will result in the termination of the Administrator's website</p>	Technical cookies	Necessity of processing the contract or taking into account the Customer's request in accordance with article 6 of the GDPR	Administrator	<p>They are necessary for the Administrator's website to function. They are used to maintain the Customer's session on the website and logging into the Account.</p> <p>They ensure proper display of the Website, adapt settings on the technical side to the Customer's choices.</p> <p>They are used to identify the user's http session. They are used in all web applications to identify user requests during sessions.</p> <p>They allow identification of the user's navigation status.</p>
Second category	Analytical cookies	The legitimate interest of the Administrator - art. 6 of the GDPR	Google Analytics Partner Administrator remains	<p>In this way, the administrator measures the movement of users on the website, examines the effectiveness of actions and also the functioning of the website, and prevents undesirable actions (movements, threats to users with undesirable content).</p> <p>As for Google Analytics - they allow to monitor the website usage through the Google Analytics tool, which is a service provided by Google Inc. with its seat in the United States of America, i.e. outside the European Union. It is used to obtain information about the user's access to the website in order to determine the number of visits to the website by the user, the date of the first and last visit, duration of visits, the search terms used by the Customer used to access the website or the link that the user clicks to redirect to the site. The administrator has no influence on the content and technical content of these files, it is determined by Google Inc. Therefore, the Administrator recommends that the Customer read the Google Analytics privacy page, https://developers.google.com/analytics/devguides/collection/cookie-usage.</p>
Third category	Marketing cookies	Consent submitted by the Customer in accordance with article 6 para. 1 letter a of the GDPR	The Administrator Partner	The Administrator uses them to personalize advertising on the website and on external websites, taking into account the actions and preferences of the Customer on the Website and to adapt the content of advertising messages to the preferences of the Customer.

You have the right to file a complaint to the leading supervisory authority in accordance with art. 56 of the GDPR, which is the Director General of the Estonian Data Protection Inspectorate, or in the case of processing significantly affecting persons in another Member State, the supervisory authority competent for that Member State, if in your opinion the processing of your personal data violates the provisions of the GDPR .