

# Privacy Policy

Updated on February 01, 2025

The Data Controller of Your Personal Data is LLP “Mirror”, reg. address: Kazakhstan, Nur-Sultan city, Saryarka district, street Zheltoksan, house 27, sq. 73, postal code 010000, BIN 220740047879 (the “Company” “We” “Us” “Our”).

By visiting Our website <https://fitmedit.com> (“Website”) and using Our Services, You acknowledge reading and fully considering this Privacy Policy.

Any notice, demand, request or other communication which You address to the Company shall either be sent by e-mail at [support@fitmedit.com](mailto:support@fitmedit.com).

User is an any person who registers an account in Platform or accesses and browses the Website (“You”, “Your”).

This Privacy Policy sets out the terms under which We collect and process Your Personal Data.

The Company reserves the right to amend and update this Privacy Policy, whenever it deems appropriate, and any changes thereof shall come in force and effect from the instance they appear online on the Website. It is important to review this Privacy Policy periodically to stay informed about any updates or changes that might have been implemented. We will inform you about such changes by publishing the amended version of the Privacy Policy on the Website with updated “Updated” date. Your continued use of the Site and/or the Services following any modifications signifies your acceptance of the revised Privacy Policy. If you do not agree with any part of this Privacy Policy, please refrain from using the Site and/or the Services.

## Data processing principles

We hold the utmost respect for your fundamental rights and consider the protection of your Personal Data to be of paramount importance. Therefore, when handling your Personal Data, we adhere to the following fundamental principles:

- Lawful and Fair Processing: We process your Personal Data only in a lawful and fair manner, maintaining full transparency in how we handle it.
- Purpose Limitation: We collect and process your Personal Data solely for specified, explicit, and legitimate purposes, as outlined in this Privacy Policy. We do not process it further in any way that is incompatible with these stated purposes.
- Data Minimization: We process your Personal Data only to the extent necessary and appropriate for the purposes for which it is collected.
- Accuracy and Updates: We make reasonable efforts to ensure that your Personal Data is accurate and up-to-date. If we discover any inaccuracies, we promptly correct or delete the information as required.

- Data Security: We employ appropriate technical and organizational measures to ensure the -security of your Personal Data.
- Compliance with Laws: As the Data Controller of your Personal Data, we comply with all applicable laws and statutory obligations.

Please be assured that your privacy is of utmost importance to us, and we are committed to safeguarding your Personal Data according to these principles and in accordance with our Privacy Policy.

## Types of Personal Data Collected

The Company collects and processes the following types of Personal Data:

- Registration and Operational Data, including:
  - E-mail address
  - Phone number
  - Full Name
- Technical Data, including:
  - IP Address
  - End user device data
  - Browsing data
  - Information on user preferences regarding the Website
  - Cookies
- Any other Personal Data directly provided by You during Your interaction with Us.

You also may be required to fill the payment information (Credit card or debit card details (e.g., card number, expiration date, CVV); Billing address; Payment transaction details), which should contain your Personal data, which is partly processed by us and processed by the payment providers.

## Purposes/Legal Basis for Data Processing

The Company processes Your Personal Data for the following purposes, based on different legal bases:

Fulfillment of Obligations:

- Administration, development, and provision of the Website and the Services.
- Enhancing user experience, including customer service, providing personalized Services, and improving the Website and the Services.
- Processing transactions.
- Verifying compliance with the Terms and Conditions of the Website.

Legitimate Interest:

- Promoting our Services and business through commercial communication, marketing, and advertising of Our Services.
- Conducting statistical and other research and analysis for the enhancement of the Website and the Services.

Consent:

- General marketing and promotions.

You have the right to withdraw your consent at any time, which can be done in writing to the contact details mentioned in this Privacy Policy. Please note that the withdrawal of consent does not affect the lawfulness of data processing carried out before the consent was revoked.

## Personal Data Sharing

For the execution of the purposes outlined in this Privacy Policy, We may provide access to or transmit Your Personal Data to the following recipients ("Data Processors"):

- Our internet and data hosting providers for hosting purposes.
- Third-party providers for the smooth operation of the Website and our information and communication systems, as well as for database storage.
- Third-party providers for data analysis and regulatory monitoring purposes.
- Third-party marketing partners for marketing and promotional purposes.
- Third-party payment providers for payment facilitation purposes.
- Current and future affiliated companies and business partners.
- Other services providers.

The processing of your Personal Data by our Data Processors is done under a contract that ensures the same level of data protection as provided in this Privacy Notice.

Additionally, in certain circumstances, we may be required by a court or other administrative authority, as part of an investigation related to unlawful activities such as money laundering or as legally mandated, to transfer Your Personal Data to public authorities, as specified by law. Rest assured that we will comply with all applicable laws and regulations in such cases.

## Personal Information we do not process

The Service does not collect or store any information about children under 16.

The Service does not process any sensitive Personal Information, such as racial or ethnic origin, membership in political parties or political opinions, religious or philosophical beliefs, trade union membership, genetic/biometric data, health, sex life, or sexual orientation.

If you believe that the Service has collected such information, please directly contact us immediately ([support@fitmedit.com](mailto:support@fitmedit.com)) in order to delete this information.

## Security

The Service employs internationally recognized standards to safeguard Your Personal Information. We utilize physical, technical, and administrative security measures to protect the privacy of the information you provide to us, ensuring it is shielded from unauthorized access, loss, misuse, disclosure, alteration, destruction, and other unlawful actions by third parties.

To ensure the protection and secure maintenance of your information, the Service has implemented various security and technical measures, including encryption, data storage diversification, internal data access restrictions, anonymization technology, data and asset diversification, and strict physical access controls to buildings and files.

However, it is important to note that transmitting information, including communications via email, over the Internet or other publicly accessible networks is not entirely risk-free. While we take utmost care to ensure the security of your data, we cannot guarantee absolute security over the Internet or third-party content. Therefore, it is advisable for you to take precautionary measures and exercise responsibility to protect your Personal Information.

## Retention of Personal Data

We retain Your Personal Data for as long as it is necessary to fulfill the specific purposes of processing outlined in this Policy, in accordance with the principles of Data Minimization and Storage Limitation.

Additionally, the Company may retain Your Personal Data even after the relevant processing purposes have expired for the following reasons:

- **Legal Obligation:** In cases where We have a legal obligation to retain Your Personal Data as required by relevant statutory provisions.
- **Legitimate Interest:** Based on Our legitimate interest, We may retain Your Personal Data to defend the Company against potential legal claims before any competent court or public authority.

Once the designated retention period is over, Your Personal Data will be securely erased from Our databases and systems.

## Your Rights As a Data Subject

**Access to Your Personal Data:** You have the right to request information about whether we hold any Personal Data about you and to receive a copy of such Personal Data.

**Rectification of Your Personal Data:** It is your responsibility to ensure the accuracy of the personal data you provide to us. If you believe that your personal data is incomplete or inaccurate, you have the right to contact us and request the correction of such personal data.

**Restriction of Processing:** You have the right to request the restriction of processing of your personal data under certain circumstances, for example, if you contest the accuracy of the personal data, and its accuracy needs to be verified.

**Erasure of Your Personal Data:** In certain circumstances, you may ask us to erase your personal data. However, please be aware that erasing some personal data may affect your ability to use our Services.

**Right to Data Portability:** Under certain circumstances, you have the right to request that we provide you with the personal data you provided us in a structured, commonly used, and machine-readable format. You may also request that we transmit this data to another party.

**Right to Object Processing:** If we are processing your personal data based on our legitimate interest, you have the right to object to the processing of your personal data. Please note that objecting to the processing of some of your personal data may affect your ability to use our Services. If you have opted in to receive marketing communications, you have the right to opt-out of those at any time.

**Right to Withdraw Consent:** If you have provided consent for the processing of your personal data for a specific purpose, you have the right to withdraw your consent at any time. The withdrawal of your consent does not affect the lawfulness of the processing based on your consent before its withdrawal.

**Right to Lodge a Complaint:** You have the right to lodge a complaint with your local data protection authority if you believe that we are not complying with applicable data protection laws.

Any requests relevant to the above rights must be addressed in writing to [support@fitmedit.com](mailto:support@fitmedit.com).

## Your Obligations

By using Our Website and providing Your Personal Data, You acknowledge and agree that it is your responsibility to provide actual, accurate, and complete data as requested by the Company. Additionally, You are required to promptly inform Us of any changes to Your information to ensure that it remains up-to-date and accurate.

In the event of a breach of Your obligations or if We have reasonable grounds to suspect that the information You have provided is false, incomplete, or in violation of applicable laws or this Privacy Policy, We reserve the right to reject Your application for registration or to suspend or terminate your account immediately without prior notice. In such circumstances, You are not entitled to any compensation due to the rejection of Your application, suspension, or termination of your account.

## Cookies

We utilize cookies to enhance the functionality of our website and provide you with a better user experience. Cookies help us analyze visitor numbers and identify popular pages on our website. This information is vital for us to ensure that we deliver up-to-date and relevant content.

What is a Cookie?

A cookie is a small data file that is sent to your computer or mobile device by a website. It enables the website to recognize your device when you revisit the same site. Typically, a cookie contains a unique identifier, such as a randomly generated number, which is stored on your device's hard drive. Many cookies are automatically deleted once you finish using a website. Cookies are not programs and do not collect information from your computer.

Managing Cookies

Cookies are sent to your browser by a website and stored in the cookies directory on your computer. To manage your cookies settings, you need to determine the browser and its version that you are using. You can usually find this information by opening your browser, clicking on 'Help,' and then selecting 'About.' This will provide you with details about your browser version. For instructions on allowing, blocking, deleting, and managing cookies, please visit [www.aboutcookies.org](http://www.aboutcookies.org) and choose your browser. You can also refer to your browser's built-in or online help for further guidance. Consult your mobile phone's manual to learn how to manage cookies on your mobile device.

Impact of Declining or Blocking Cookies

If you decline or block cookies, the usage of the Website will not be counted, preventing us from considering your actions in data analysis and identifying ways to enhance our Website.

## Governing Law and Dispute Resolution

This Privacy Policy shall be governed by and interpreted in accordance with the laws of Estonia. Any legal action or proceeding arising under this Privacy Policy will be brought exclusively in courts located in Estonia.

## Contact us

If you have any questions, comments, or requests concerning this Privacy Policy, please feel free to contact us at [support@fitmedit.com](mailto:support@fitmedit.com). We welcome your feedback and will be happy to assist you.