

## Privacy and Cookie Policy

# **Privacy Policy: Main purpose**

The privacy policy concerns the processing and protection of Users' personal data in connection with the browse of the **www.deltahouse-invest.com** (the "Website") and any of its subpages, administered by **Deltahaus OÜ** with its registered office in Laane Tee 5, Jarvekula, Harjumaa, Rae Vald 75304, Estonia, Reg. NR12909365, VAT NºEE101874591, hereinafter referred to as "**Deltahaus OÜ**".

The privacy policy contains the rules on the collection and use of data about Users provided by them in order to receive the "Request Deltahouse Catalogue" and/or to use the "Newsletter" service provided by Deltahaus OÜ.

Our top priority is to ensure privacy protection for the users of our Website, at the level corresponding at least to the minimum standards set in provisions of generally applicable law, in particular in 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 (Official Journal of the European Union L 119/1) - General Data Protection Regulation (GDPR).

#### **Personal data Controller**

All user data collected by the Website as a result of its use is administered by **Deltahaus OÜ** with its registered office in Laane Tee 5, Jarvekula, Harjumaa, Rae Vald 75304, Estonia.

## 1. Rules for collection of information and personal data

- 1.1 While browsing the Website, some data is collected automatically, i.e. information regarding the use of the Website, as well as the IP addresses of Users. Through the use of various technologies we may log certain information, such as browser type, operation system, date and time of entry, number of connections, number of subpages of the Website opened, and content viewed.
- 1.2 Users are not required to disclose and/or share any personal data to view the contents of the Website.
- 1.3 The Website contains order forms for the delivery of the "Request Deltahouse Catalogue" and "Newsletter" services, sent by the postal operator or courier. Personal data needs to be provided to complete these forms.

## 2. Extent and use of collected data and information

- 2.1 A user of the Website may be requested to disclose the following personal data: e-mail address, correspondence addresses, telephone number, information regarding the planned house construction, in particular the plot and the house.
- 2.2 If the Service User has placed an order for a service provided electronically free delivery of newsletters, the obtained e-mail address (e-mail address) is added to the e-mailing list and is used to send the Newsletter to the User.
- 2.3 Information collected automatically is used for Website management, detection of security breaches, surveying User Website navigation, and for statistical purposes, including using information identifying tools, e.g. about the region from which the connection was made, IP address, date and time of connection, source and number of connections made, number of the Website's subpages viewed, or to personalize the content of the Website's subpages and to track the User's activity on the Website. This information will not be linked to personal User data nor will it be used to determine a particular User's identity. The type of automatically



- collected data depends on the preferences of the web browser selected by the User. All Users are advised to verify their web browser settings, in order to determine the kind of information being automatically disclosed by their browser or to modify to their settings accordingly. It is recommended users explore the contents of their web browser's help sections.
- 2.4 It is hereby stated that, in accordance with the provisions of generally applicable law, there may arise a legal obligation to disclose data such as, the IP address of the Website's User upon request of the competent authority.

# 3. Terms and conditions for personal data processing

- 3.1 Personal data is processed upon consent expressed by the User whose data is to be processed. It is also processed when Deltahaus OÜ, as the data Controller, is allowed to do so under the provisions of law without requiring authorisation.
- 3.2 User consent to process personal data is granted by marking a specific field, indicated during any procedure aimed at facilitating access to selected features of the Website, e.g. when filling in a form.
- 3.3 The data are collected for the purposes of marketing services' performance offered by the Website until the consent is withdrawn (which is results in the lack of ability to use the services of "Request Deltahouse Catalogue", "Newsletter").
- 3.4 Deltahaus OÜ does not disclose personal data to any third party, unless consent has been granted by the User or where disclosure of personal data is required by provision of law.
- 3.5 Deltahaus OÜ, as the personal data controller, is may entrust the processing of personal data collected by the Website to an external entity by means of a written agreement, in accordance with the 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 (Official Journal of the European Union L 119/1) General Data Protection Regulation (GDPR).

# 4. User rights

- 4.1 The User has the right to access to his personal data, their rectification, erasure, restriction of processing, to withdraw his consent at any time, the right to data portability and to lodge a complaint with a supervisory authority.
- 4.2 All users of the Website are entitled to be informed whether their personal data is processed and to what purpose and extent. Such information is also indicated in this document.
- 4.3 The User may contact with the data Controller or directly with the Data Protection Officer of Deltahaus OÜ as indicated in "Contact" section.
- 4.4 Each user is entitled, without giving a reason and without incurring any costs, to change their email address to which the free newsletter is sent, at any moment, or to unsubscribe from any service comprising free newsletter delivery, by clicking the link called "Newsletter", located in the footer of each newsletter email, entering the email address in the appropriate box and clicking "Sign Out".

# 5. Cookies

5.1 On this Website, we use cookies, i.e. small text-numeric files, which are transferred by our ICT system and stored on User's device (on the computer, telephone or other device of the User from which the Website was connected) when browsing the Website and allow for later identification of the User in the case of reconnection with the Website from the device (e.g. computer, telephone) on which they have been stored.



- 5.2 ookies collect data on the use of the Website by the User, and their main purpose is to facilitate the use of the Website, customize the Website to the needs and expectations of the User (personalization of the Website subpages), Website traffic analysis.
- 5.3 This Website uses Google Adwords cookies. Google AdWords uses the technology of text files placed on your device, which allows to evaluate the correctness and effectiveness of advertising carried out using the services of the AdWords network, such as:

# 5.3.1 Remarketing

- 5.3.2 Interest categories
- 5.3.3 Similar audiences
- 5.3.4 Interest-Based Advertising
- 5.3.5 Demographic and geographic targeting.

#### 5.4 Cookies we use:

- 5.4.1 session cookies collect information about the User's activities and exist only during the session, which begins when the Website is opened and ends with closing,
- 5.4.2 persistent cookies they are stored on the User's device (on the computer, telephone or other device of the User from which the Website was connected) and remain on your device for a fixed period after closing the browser,
- 5.4.3 own cookies placed by us and cookies placed by third parties, approved by Deltahaus OÜ, including Google Analytics cookies, used to analyze Website Users' activities for statistical purposes.

# Cookies placed by the Deltahaus OÜ Website and the purposes for which they are used:

Cookie	Cookie type	Purpose	Validity
name			
PHPSESSID	session	Stores the session ID. This cookie is	End of the session
		necessary to store information about	
		the fact that you are logged in to the	
		Website.	

# Cookies placed on the Deltahaus OÜ website by third parties and the purposes for which they are used: GOOGLE ADWORDS

Cookie name	Cookie type	Purpose	Validity
PREF	persistent	Helps personalize ads on Google services (e.g. in search engine) - especially if you are not logged in to your Google account	2 years (from the last update)
id	persistent	From the doubleclick.net domain, used for advertising outside of Google's sites	2 years (from the last update)
drt_, FLC, NID	persistent	Ad server cookie googleads.g.doubleclick.net. Collects information about user activities after clicking on the Google Adwords ad and transmit back information about conversions	12 hours (from the last update)



#### YOUTUBE

Cookie	Cookie type	Purpose	Validity
name			
_ga	persistent	Used to distinguish users	2 years
_gid	persistent	Used to distinguish users	24 hours
_gat	persistent	Used to throttle request rate	1 minute
AMP_TOKEN	session	Contains a token that can be used to retrieve a Client ID from AMP Client ID service	From 30 seconds to 1 year

#### **GOOGLE MAPS**

Cookie	Cookie type	Purpose	Validity
name			
PREF	persistent	This cookie is saved when the browser has	2 years (from the
		access to facebook.com. The file allows to recognize suspicious login attempts, thus ensuring greater security for users. For example, it is used to signal unsuccessful attempts to log in or create multiple accounts for sending spam.	

# Privacy protection principles on third party websites:

FACEBOOK	Deltahaus OÜ on the Website places the "Like" and "Share" buttons linked to
	Facebook. For this purpose, the code referring to Facebook is placed in the
	relevant sections. By using the "Like" button or recommending an image or a page
	section, the User logs in to Facebook, in which the Facebook privacy policy applies.
	This policy can be found under below links.

- 5.5 Cookies do not store Website Users' personal data. Cookies are not used to identify the User.
- 5.6 Cookies are used on the Website with the the User's consent.
- 5.7 Consent can be expressed by respective software configurations, in particular the browser, installed in the devices used by the User to view the content of the Website.
- 5.8 The User may at any point of time revoke or change the scope of previously expressed consent to use cookies on the Website and delete cookies from the browser.
- 5.9 The Website User may also at any point of time restrict or disable cookies through browser setting to block cookies or to warn the User against saving a cookie file on the device used by the User to browse the Website content. In this case, however, it may happen that the use of the Website will be less efficient, the User will not have access to certain content, will not be able to use some of the Website's functionalities, and in extreme cases the correct display of the Website pages may be completely blocked.
- 5.10 Please see below information on how to disable and enable cookies in the most frequently used internet browsers:

INTERNET EXPLORER	In the Internet Explorer browser, click:
	1. "Tools"
	2. "Internet options"
	3. "Block all cookies"



GOOGLE CHROME	In the Google Chrome browser, click:  1. "Chrome menu" in the upper right corner  2. "Settings"  3. "Show advanced settings"  4. "Content settings" in the privacy section  5. "Block cookies and data from third-party websites"
FIREFOX	In the Firefox browser, click: 1. "Tools" 2. "Options" 3. "Privacy" 4. From the list of Firefox will "Use custom settings for history" 5. Select the appropriate option
OPERA	In the Opera browser, click: 1. "Settings" 2. "Preferences" 3. "Advanced" 4. "Cookies" 5. Select the appropriate option
SAFARI	In the Safari browser, click: 1. "Settings" in the upper right corner 2. "Preferences" 3. "Privacy" 4. Select the appropriate option
MOBILE PHONE	Mobile phones - open the Internet, select: 1. "Settings" 2. "Privacy" 3. and go to cookie settings.

# 6. Securing of personal data

The Website is protected with security measures in order to protect of personal data processed by Deltahaus OÜ from their modification, destruction, unauthorized access and disclosure or acquisition and their loss, as well as processing of personal data in breach of applicable data protection law.

Access to the processing of Users' personal data is only allowed to a limited number of persons who have the authorisation granted to them by Deltahaus OÜ as the data Controller or persons to whom they were transferred to maintain and operate the Website and to provide the "Request Deltahouse Catalogue" or "Newsletter" service. Data recipients include: providers of information systems and IT service providers, postal operators, courier services, bodies authorised under the law to receive User data.

#### 7. Contact

Any questions related to the processing and protection of personal data of Website Users and the use of cookies, including those relating to this "Privacy policy and cookies", please send to the address of the data Controller: Deltahaus OÜ — Oleksiy Borodavka - at the address mailto:alex@deltahouse-invest.com or by calling the phone numer 0038 097 443 33 44.