



## Privacy Policy

Effective Date: **Oct 1, 2021**

This Privacy Policy applies to the websites (“Platform”) owned and operated by 7 Figures OÜ (“MotherLink”). The provisions herein constitute the regulatory framework of the collection, usage, control and retention of personal information about users (“You”) of the Platform. This Privacy Policy does neither apply to data collected by any other means than accessing and using the Platform nor to data collected by third parties. The use of collected information shall be limited exclusively to the purposes defined under this Privacy Policy.

### I. Collected Information

#### 1. Visitor Data

MotherLink uses cookies, beacons, tags and scripts to collect non-personally identifiable information (“Non-PII”) about users of the Platform. These technologies may be used for analyzing trends, administering the Platform, saving user settings, authentication, tracking user behavior around the Platform and gathering general demographic information about the userbase.

You can control the use of cookies at your browser level. If you reject cookies, you may still use the Platform but your ability to use some features or areas of the Platform may be limited. The Platform uses Google Analytics to track user activity, page content, click/touch, movement, scroll, and keystroke activity in some cases. If you are located in Europe, your IP address, keystroke activity, and personal information are neither stored nor shared with third parties.

For more general information or instructions on how to opt-out, please contact our Data Protection Officer at [help@motherlink.io](mailto:help@motherlink.io).

#### 2. Registration Data

Upon registration on the Platform, MotherLink may, in addition to the information collected about visitors, also collect personally identifiable information (“PII”) about you:

##### (a) Natural Person

If you are a natural person, MotherLink may collect the following PII: Full name, physical address, phone number, E-Mail address and IP address.

(b) Legal Person

If you register on behalf of a legal person, MotherLink may, in addition to the information collected about natural persons, also collect any of the following PII: Company name, company registration number, company address and tax identification number.

3. Payment Data

If you purchase a service on the Platform, MotherLink will collect the following PII to facilitate invoicing, financial reporting and the payment transaction through a thirdparty payment provider: Billing name, billing address, selected payment method and IP address used for paying.

Any additional data that may be necessary for the payment provider to assess the risk and/or transact the payment, including but not limited to payment card data, is collected solely by the third-party payment provider and subject to their Privacy Policy. MotherLink does at no point collect or store any Card Holder Data (CHD), Sensitive Authentication Data (SAD) or any other payment card data requiring PCI-DSS compliance.

## II. Use of Information

1. General Use

MotherLink uses the collected information to operate and maintain the Platform, to interact with its users and to ensure compliance with Know Your Customer (KYC) regulations. The legal basis for this use of personal data is art. 6(1)(f) of the EU General Data Protection Regulation (GDPR).

2. Marketing Communications

If you have given your consent, MotherLink may use the collected information to send you marketing communications, including but not limited to general newsletters and individual service offers. The legal basis for this use of personal data is art. 6(1)(a) of GDPR. If you no longer wish to receive these E-Mails, you may opt out of them at any point.

## III. Information Sharing

1. Personally Identifiable Information

MotherLink does neither rent nor sell your PII to third parties. MotherLink may store personal information in locations outside of its direct control, including but not limited to servers or databases co-located with external hosting providers. Any PII you elect to make publicly available on the Platform itself or by providing it to MotherLink in order to facilitate the execution of a purchased service, such as any personal data provided

for articles to be posted in public, will be available to others. In accordance with section I(4) of the Terms of Service, MotherLink holds no responsibility for information published on third-party websites and you acknowledge that such information may remain viewable via caches and web-archives even in case of subsequent removal.

## 2. Non-Personally Identifiable Information

MotherLink may share non-PII, including but not limited to general anonymous usage data, referring/exit pages, visited URLs, used platform types and number of clicks with third parties to provide them with data about usage patterns for certain services. Such non-PII may be stored indefinitely.

## 3. Legal Obligations

MotherLink may disclose your information where required to do so by law, if subject to subpoena or other legal proceeding or if MotherLink reasonably believes that such action is necessary to comply with the law and the reasonable requests of law enforcement, to enforce the Terms of Service or to protect the security or integrity of the Platform and to exercise or protect the rights, property, or personal safety of MotherLink, its users or others.

## 4. Change of Control

MotherLink may buy or sell/divest/transfer the company (including any shares in the company), or any combination of its products, services, assets and/or businesses. Your information such as usernames and E-Mail addresses, and other user information related to the Platform may be among the items sold or otherwise transferred in these types of transactions. MotherLink may also sell, assign or otherwise transfer such information in the course of corporate divestitures, mergers, acquisitions, bankruptcies, dissolutions, reorganizations, liquidations, similar transactions or proceedings involving all or a portion of the company. You will be notified via E-Mail of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

## 5. Testimonials

MotherLink may display personal testimonials of customers on the Platform in addition to other endorsements. With your consent, MotherLink may post your testimonial along with your name. If you wish to update or delete your testimonial, please contact us at [help@motherlink.io](mailto:help@motherlink.io).

# IV. Storage and Processing

Your information collected by MotherLink may be stored and processed in Estonia, Germany, or any other country in which MotherLink or its subsidiaries, affiliates or service providers maintain facilities. MotherLink may transfer collected information, including but not limited

to PII, to affiliated entities or to other third parties across borders and in-between countries or jurisdictions worldwide.

## V. Data Protection

MotherLink values your privacy and data by ensuring state-of-art data protection technologies and methods to be applied at all stages of collecting, processing and storing your personal data. The Platform is protected by the Secure Sockets Layer (SSL) protocol which encrypts any personal information you enter into registration/login forms before it is sent from your computer to the Platform while all user data are stored on the MotherLink servers using bcrypt/md5 encryption technologies.

Notwithstanding the aforesaid MotherLink cannot ensure or warrant the security of any information you transmit to MotherLink or guarantee that your information on the Platform may not be accessed, disclosed, altered or destroyed by breach of any of MotherLink's industry standard physical, technical or managerial safeguards. If you have any questions about security on the Platform, please contact us at [help@motherlink.io](mailto:help@motherlink.io).

## VI. Compromise of Personal Information

In the event that personal information is compromised as a breach of security, MotherLink will promptly notify its users in compliance with applicable law.

## VII. Your choices about your information

To review, correct, update or delete inaccuracies regarding the information about you that MotherLink stores, please contact us directly at [help@motherlink.io](mailto:help@motherlink.io). MotherLink will address your request within seventy-two hours. Data protection law gives you a range of rights in connection with the processing of your personal data:

1. You have the right to request that MotherLink rectifies or deletes the personal data or restricts the processing of your personal data if you think they are inaccurate.
2. You have the right to object against the processing based on MotherLink's legitimate interests as a legal basis. MotherLink is required to assess and act on your request. Additionally, you also have the right to data portability if applicable.
3. You have the right to lodge a complaint with your local supervisory authority.

If you have any questions about this Privacy Policy or your rights under data protection law, please contact our Data Protection Officer: Attn. Data Protection Officer (DPO), 7 Figures OÜ, Ahtri 6a – B building, 8th Floor, 10151 Tallinn, Estonia, Email: [help@motherlink.io](mailto:help@motherlink.io).

## VIII. Enforcement and Dispute Resolution

In compliance with the EU-US Privacy Shield principle, MotherLink commits to resolve complaints about your privacy and the collection or use of your personal information. EU Data Subjects with questions or concerns about the use of their Personal Data should contact us at: **help@motherlink.io**. If your question or concern cannot be satisfied through this process, MotherLink has further committed to refer unresolved privacy complaints under the EU-US Privacy Shield Framework to the BBB EU Privacy Shield, an independent dispute resolution mechanism operated in the United States by the Council of Better Business Bureaus. If you do not receive timely acknowledgement of your complaint or if your complaint is not satisfactorily addressed by MotherLink, EU Individuals and Data Subjects should visit <http://bbb.org/EU-privacy-shield/for-eu-consumers/> for more information or to file a complaint. The services of the BBB EU Privacy Shield will be provided at no cost to you.

## IX. Retention of Information

### 1. Registered Users

If you have an account on the Platform, MotherLink will retain your information for as long as your account is active or as needed to provide you services. MotherLink will retain and use your information as necessary to comply with legal obligations, resolve disputes and enforce user agreements.

### 2. Visitors

If you are a visitor to the Platform, MotherLink will retain your information for as long as necessary but no longer than one year after your last visit to the Platform.

## X. Children's Privacy

MotherLink does not knowingly collect or solicit personal information from anyone under the age of 13. In the event that MotherLink gets to know about the collection of personal information from a child under age 13, MotherLink will delete that information as quickly as possible. If you believe that MotherLink might have any information from or about a child under 13, please contact us at **help@motherlink.io**.

## XI. Notification Procedures

MotherLink provides notifications, whether such notifications are required by law or are for marketing or other business-related purposes, to you via E-Mail as determined by MotherLink in its sole discretion. MotherLink reserves the right to determine the form and means of providing notifications to you, provided that you may opt out of certain means of notification as described in this Privacy Policy.

## XII. External Links

MotherLink is not responsible for the practices employed by websites or services linked to or from the Platform, including the information or content contained therein. This Privacy Policy does not apply to third-party websites or services. Your browsing and interaction on any thirdparty website or service, including those that have a link or advertisement on the Platform, are subject to that third party's own regulations and policies.

## XIII. Social Media

The Platform may use social media features, such as the Facebook Like button and other widgets. These features may collect your IP address and which page you are visiting on the Platform and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on the Platform. Your interactions with these features are governed by the privacy policy of the organization providing it.

## XIV. Changes to the Privacy Policy

All changes to this Privacy Policy are effective when they are posted on this page. If MotherLink changes the policy in a material manner, MotherLink will notify its users via E-Mail and/or a prominent notice on the Platform, prior to the change becoming effective and update the 'effective date' at the top of this page.

## XV. Contact

If you have any questions about this Privacy Policy, please contact us at [help@motherlink.io](mailto:help@motherlink.io). or send mail to: 7 Figures OÜ, Ahtri 6a – B building, 8th Floor, 10151 Tallinn, Estonia.