

PRIVACY POLICY

1. Introduction and General Provisions

- 1.1** This Privacy Policy ("Policy") explains how Leonid Tsvetkov (hereafter, the "Company"), operating under the status of autónomo in the Kingdom of Spain, NIE: Y9789783P, with a registered address at Avda del Puerto 250, P03 9, Valencia, collects, processes, stores, and protects the personal data of individuals ("Users") who visit or interact with the Bloom website (the "Site"), the Bloom Bot on Telegram (the "Bot"), or any other platforms or services provided by the Company (collectively, the "Services").
- 1.2** This Policy is drafted in compliance with Regulation (EU) 2016/679 (General Data Protection Regulation, "GDPR"), the Organic Law 3/2018 on Personal Data Protection and Guarantee of Digital Rights of Spain ("LOPDGDD"), and other applicable legal frameworks. By using or accessing the Services, Users acknowledge that they have read and understood this Policy.
- 1.3** If you, as a User, do not agree with any provision of this Policy, you must cease using the Services immediately. The Company reserves the right to update or modify this Policy at any time by posting a revised version on the Site. Any significant changes may be communicated via email or platform notifications.

2. Data Controller Information

- 2.1 Data Controller.** The entity responsible for determining the purposes and means of processing your personal data is Leonid Tsvetkov, NIE: Y9789783P, acting as an autónomo in Spain, with a registered address at Avda del Puerto 250, P03 9, Valencia.
- 2.2 Contact Details.** Users may direct any inquiries, complaints, or requests related to data protection to the Company's email address, as indicated on the Site.
- 2.3 Applicability.** This Policy applies to personal data collected by the Company through the Site, the Bot, or any other online or offline means explicitly referenced by the Company.

3. Categories of Personal Data Collected

3.1 Data Provided Directly by Users

- **Registration and Account Information:** When Users register for an account or interact with the Services, they may provide personal details such as name, email address, telephone number, and other relevant contact information.
- **Payment Data:** Users may provide transaction-related data (e.g., partial payment details, payment method, or transaction IDs). The Company does not directly process

or store full payment credentials such as complete credit card numbers; these are handled by thirdparty payment processors (Revolut, Stripe, cryptocurrency gateways). платежные реквизиты, такие как полные номера кредитных карт; эти данные обрабатываются сторонними платежными процессорами (Revolut, Stripe, криптовалютные шлюзы).

3.2 Data Collected Automatically

- **Log Data:** The Site or Bot may collect standard log information such as IP addresses, browser types, operating systems, referring URLs, and timestamps.
- **Cookies and Similar Technologies:** The Company utilizes cookies, pixel tags, or similar technologies to enhance the user experience, remember preferences, and analyze traffic. Details are provided in the Cookies Policy section below.

3.3 Special Categories of Data

The Company does not intentionally collect or process special categories of personal data (e.g., health information, racial or ethnic origin, religious beliefs) unless such processing is legally required or the User explicitly provides such data in communications with the Company.

4. Legal Bases and Purposes of Processing

4.1 Legal Grounds. The Company processes personal data primarily under the following legal bases:

- **Contract Performance:** When processing is necessary for the performance of a contract to which the User is a party or to take steps at the User's request prior to entering into a contract (e.g., providing the software or related services).
- **Consent:** When the User gives clear consent for the Company to process personal data for specific purposes (e.g., receiving newsletters or updates).
- **Legitimate Interests:** When processing is necessary for the Company's legitimate interests, provided those interests are not overridden by the User's fundamental rights or freedoms (e.g., improving the Site, ensuring security, preventing fraud).
- **Legal Obligations:** When processing is required to comply with a legal or regulatory obligation (e.g., Spanish tax or accounting rules).

4.2 Purposes of Processing. The Company may process personal data for the following purposes:

- **Account Management:** Creating and managing User accounts, providing login credentials, and enabling secure access to the Services.

- **Payment and Transaction Handling:** Processing orders, verifying payments, and facilitating refunds in line with the Company's Refund Policy.
- **Customer Support and Communication:** Responding to inquiries, providing technical support, sending essential notifications about the Services.
- **Analytics and Service Improvement:** Monitoring and analyzing trends, usage, and activities to improve the quality and user experience of the Site, Bot, and other Services.
- **Legal Compliance:** Fulfilling obligations imposed by applicable laws, regulations, and government authorities.

5. Data Retention Periods

- 5.1 Storage Duration.** The Company retains personal data only for as long as it is necessary to achieve the purposes for which it was collected or to comply with legal requirements. Once this period expires, personal data will be securely deleted or anonymized.
- 5.2 Criteria for Retention.** Retention periods may vary depending on the type of data, the purposes of processing, and the legal obligations (e.g., mandatory retention under tax or regulatory provisions).

6. Disclosure of Personal Data to Third Parties

- 6.1 Service Providers.** The Company may share personal data with trusted third-party service providers who perform functions on the Company's behalf, such as payment processing, hosting, analytics, or email delivery. These service providers are contractually obligated to use the data exclusively for providing services to the Company and not for any other purpose.
- 6.2 Legal Compliance and Protection.** The Company may disclose personal data if required by law or in response to valid requests from law enforcement or government agencies, or to protect the Company's rights, property, or safety.
- 6.3 Business Transfers.** In the event of a merger, acquisition, or any form of sale of all or part of the Company's assets, personal data held by the Company may be among the assets transferred to the buyer, subject to the Buyer's commitment to respect the User's privacy in accordance with this Policy.

7. International Data Transfers

- 7.1 Transfers Within the EEA.** The Company primarily stores and processes personal data within the European Economic Area (EEA).

7.2 Transfers Outside the EEA. If the Company or its service providers transfer personal data outside the EEA to a jurisdiction that may not have data protection laws equivalent to those in the EEA, the Company will implement appropriate safeguards (e.g., Standard Contractual Clauses or adequacy decisions) in compliance with GDPR requirements.

8. User Rights

8.1 Access, Rectification, Erasure, and Other Rights. Under GDPR and LOPDGDD, Users have the following rights with respect to their personal data:

- **Right of Access:** The right to obtain confirmation whether personal data is processed and, if so, to request a copy of such data.
- **Right to Rectification:** The right to correct inaccurate or incomplete personal data.
- **Right to Erasure (“Right to be Forgotten”):** The right to request the deletion of personal data under certain circumstances, for example when it is no longer needed for its original purpose.
- **Right to Restrict Processing:** The right to request the restriction of data processing if there is a dispute about the accuracy or legitimacy of such processing.
- **Right to Data Portability:** The right to receive personal data in a structured, commonly used, and machine-readable format, and the right to transmit that data to another data controller when technically feasible.
- **Right to Object:** The right to object to the processing of personal data, especially when processing.

8.2 Exercising Rights. To exercise any of these rights, Users may contact the Company using the contact information provided on the Site. The Company shall respond to such requests within the time limits prescribed by applicable law

8.3 Complaint to Supervisory Authority. If a User believes their data protection rights have been violated, they may lodge a complaint with the relevant data protection authority in Spain (Agencia Española de Protección de Datos, AEPD) or in the EU Member State of their habitual residence or place of work.

9. Data Security Measures

9.1 Organizational and Technical Safeguards. The Company implements a variety of security measures to protect personal data from unauthorized access, alteration, disclosure, or destruction. These measures may include encrypted communications (HTTPS/TLS), firewalls, secure hosting environments, and restricted access to personal data.

9.2 User Responsibilities. Users are responsible for choosing secure passwords, keeping login credentials confidential, and ensuring that the devices they use to access the Services are adequately protected against malware or other threats.

10. Cookies Policy

10.1 Definition of Cookies. Cookies are small text files placed on your device by websites that you visit. They are widely used to enable sites to function more efficiently and to track User interactions.

10.2 Types of Cookies Used:

- **Essential Cookies:** Necessary for the basic functionality of the Site (e.g., maintaining session state). Disabling these cookies may render certain parts of the Site unusable.
- **Analytics Cookies:** Used to collect aggregated data about how Users interact with the Site (e.g., pages visited, time spent, and links clicked). These cookies help improve the Site's performance and User experience.
- **Functional Cookies:** Remember User preferences and settings (e.g., language selection) to personalize the browsing experience.

10.3 Consent to Cookies. By using the Site, Users agree to the storage of cookies on their device unless they have adjusted their browser settings to refuse cookies.

10.4 Managing Cookies. Users can manage or delete cookies at their discretion through browser settings. Specific instructions vary by browser, and disabling certain cookies may impact the functionality and performance of the Site.

10.5 Third-Party Cookies. Some cookies may be placed by third-party service providers (e.g., analytics platforms, embedded content providers) who have separate cookie policies and data handling practices.

11. Third-Party Links and Services

11.1 The Site or Bot may contain links to websites or services operated by third parties. The Company does not control these external resources and is not responsible for their privacy practices. Users should consult the privacy policies of third-party websites or services for information on how they collect and use personal data.

12. Updates to This Policy

- 12.1** The Company reserves the right to modify or update this Policy at any time. Any significant changes will be posted on the Site, and where appropriate, the Company may notify Users via email or a platform notice. By continuing to use the Services following any modifications, Users acknowledge and accept the updated Policy.

13. Contact and Further Information

- 13.1** For any inquiries regarding this Policy, or to exercise any data protection rights, Users may contact the Company using the contact details published on the Site.
- 13.2** The Company aims to address all requests and complaints promptly and in accordance with applicable laws and regulations.

By continuing to use the Services or by providing personal data to the Company, Users signify their understanding and acceptance of this Privacy Policy (Политика конфиденциальности) and Cookies Policy.