

PRIVACY POLICY

LAST UPDATED ON MARCH 1, 2021

We at Anna Barulina Photography respect Your privacy. This Privacy Policy is designed to explain how We collect, use, share, and protect the personal information You provide to Us when You access Our website, purchase Our goods or services, or engage with Us on social media, as well as Your own rights to the information We collect.

Please read this Privacy Policy carefully. We will alert You to any changes to this Policy by changing the “last updated” date at the top of this Policy. Any changes become effective immediately upon publication on Our website, and You waive specific notice of any changes to the Policy by continuing to use and access Our site(s). We encourage You to review this Privacy Policy periodically when You use Our website for any purpose or engage with Us on social media. You are deemed to have accepted any changes to any revised Privacy Policy by Your continued use of Our website after the revised Privacy Policy is posted.

INFORMATION THAT WE COLLECT

We collect a variety of information from You when You visit Our website, make purchases, or interact with Us on social media. By accepting this Privacy Policy, You are specifically consenting to Our collection of the data described below, to Our use of the data, to the processing of this data, and to Our sharing of the data with third-party processors as needed for Our legitimate business interests. The information We collect may include:

PERSONAL DATA

Personal Data is information that can be used to identify You specifically, including Your name, shipping address, email address, telephone number, or demographic information like Your age, gender, or hometown. You consent to giving Us this information by providing it to Us voluntarily on Our website or any mobile application. You provide some of this information when You register with or make purchases from Our website. You may also provide this information by participating in various activities associated with Our site, including responding to blogs, contacting Us with questions, or participating in group training. Your decision to disclose this data is entirely voluntary. You are under no obligation to provide this information, but Your refusal may prevent You from accessing certain benefits from Our website or from making purchases.

DERIVATIVE DATA

Derivative data is information that Our servers automatically collect about You when You access Our website, such as Your IP address, browser type, the dates and times that You access Our website, and the specific pages You view. If You are using a mobile application, Our servers may collect information about Your device name and type, Your phone number, Your country of origin, and other interactions with Our application. Derivative data may also include data collected by third-party service providers, such as advertising and analytics providers, and may include cookies, log data, or web beacons. Cookies are discussed more fully below. Derivative data collected by third-party service providers generally does not identify a specific individual.

FINANCIAL DATA

Financial data is data that is related to Your payment method, such as credit card or bank transfer details. We do not collect financial data in order to allow You to purchase, order, services from Our website and any related mobile apps. You should review processors’ Privacy Policy to determine how they use, disclose, and protect Your financial data.

SOCIAL NETWORKING DATA

We may access personal information from social networking sites and apps, including Facebook, Instagram, LinkedIn, Twitter, Snapchat, Tik Tok or other social networking sites or apps not named specifically here, which may include Your name, Your social network username, location, email address, age, gender, profile picture, and any other public information. If You do not want Us to access this information, please go to the specific social networking site and change Your privacy settings.

MOBILE DEVICE DATA

If You use Our website via a mobile device or app, We may collect information about Your mobile device, including device ID, model and manufacturer, and location information.

OTHER DATA

On occasion, You may give Us additional data in order to enter into a contest or giveaway or to participate in a survey. You will be prompted for this information and it will be clear that You are offering this kind of information in exchange for an entry into such a contest or giveaway.

HOW WE USE YOUR INFORMATION

Your information allows Us to offer You certain products and services, including the use of Our website, to fulfill Our obligations to You, to customize Your interaction with Our business and Our website, and to allow Us to suggest other products and services We think might interest You. We generally store Your data and transmit it to a third party for processing. However, to the extent We process Your data, We do so to serve Our legitimate business interests (such as providing You with the opportunity to purchase Our goods or services and interact with Our website or mobile app).

Specifically, We may use the information and data described above to:

1. Create and administer Your account; and
2. Deliver any services purchased by You to You; and
3. Correspond with You; and
4. Process payments or refunds; and
5. Contact You about new offerings that We think You will be interested in; and
6. Interact with You via social media; and
7. Send You a newsletter or other updates about Our work or website; and
8. Deliver targeted advertising; and
9. Request feedback from You; and
10. Notify You of updates to Our product and service offerings; and
11. Resolve disputes and troubleshoot any problems; and
12. Administer contests or giveaways; and
13. Generate a profile that is personalized to You, so that future interactions with Our website will be more personal; and
14. Compile anonymous statistical data for Our own use or for a third party's use; and
15. Assist law enforcement as necessary; and
16. Prevent fraudulent activity on Our website or mobile app; and
17. Analyse trends to improve Our website and offerings.

FOUNDATIONS FOR USING AND PROCESSING YOUR DATA

The information We collect and store is used primarily to allow Us to offer goods and services for sale. In addition, Anna Barulina Photography may collect, use, and process Your information based on the following grounds:

LEGITIMATE BUSINESS INTERESTS

We may use and process Your data for Our legitimate business interests, which include, among other things, communicating with You, improving Our services, improving Our website, and providing You with the information that You have requested.

Performance of a Contract: We may use and process Your information to enter into a contract with You and to perform Our contractual obligations to You.

Consent: We may use Your data, or permit selected third parties to use Your data, based on Your consent to Our use and sharing of that data. You may withdraw Your consent at any time, but doing so may affect Your ability to use Our website or other offerings.

As required by law: We may also use or process Your data as required for Us to comply with legal obligations.

WHY WE DISCLOSE YOUR INFORMATION

We may share Your information with third parties in certain situations. In particular, We may share Your data with third-party processors as needed to serve Our legitimate business interests, which include administration of Our website, administration of Your account, entering into contracts with You, communicating with You, taking orders for services, delivering Our services, identifying trends, protecting the security of Our business and website, and marketing additional goods and services to You. The legal basis for Our disclosure of Your data is both Your Consent to this Privacy Policy and Our own right to protect and promote Our legitimate business interests.

The following are specific reasons why We may share Your information:

Third Party Processing: We may disclose Your information to third parties who assist Us with various tasks, including payment processing, beauty services, email delivery, communications, and customer service. We may not always disclose these third-party processors if not required by law. We do not authorize them to use or disclose Your personal information except in connection with providing Our business with their services.

By Law: We may share Your data as required by law or to respond to legal process, including a subpoena, or as necessary to protect the rights, property, and safety of others. This includes sharing information with other parties to prevent or address fraud and to avoid credit risks.

To Protect Our Business: We may use Your information to protect Our business, including to investigate and remedy any violations of Our rights or policies. We may also disclose Your information as reasonably necessary to acquire and maintain insurance coverage, manage risks, obtain financial or legal advice, or to exercise or defend against legal claims.

Business Transfers: In the unlikely event Our business engages in a merger, acquisition, bankruptcy proceedings, dissolution, reorganization, or similar transaction or proceeding, We may transfer or share Your data as part of that proceeding. In such transitions, customer information is one of the business assets that is acquired by a third party. You acknowledge that such business transfers may occur and that Your personal information can continue to be stored, used, or processed as otherwise set forth in this privacy policy.

Interaction With Others: If You interact with others on Our website or mobile app, such as participating in a group chat or a group online course, other users may have access to some of Your data, including Your name, profile picture, and Your history of interaction with Our website, such as prior comments or posts.

Online Postings: When You post online, Your posts may be viewed by others, and We may distribute Your comments outside the website.

External Links: Our website may include hyperlinks to other websites not controlled by Us. We suggest You exercise caution when clicking on a hyperlink. Although We use reasonable care in including a hyperlink on Our own web page, We do not regularly monitor the websites of these third parties and are not responsible for any damage or consequences You suffer by using these hyperlinks. We are not bound by the Privacy Policies of any third-party website that You access by a hyperlink, nor are they bound by ours. We encourage You to read the Policies of those third-party websites before interacting with them or making purchases. They may collect different information and by different methods than We do.

Other Purposes: We may disclose Your personal data as necessary to comply with any legal obligation or to protect Your interests, or the vital interests of others or Our business.

TRACKING TECHNOLOGIES

Log Files: Like many other websites, We make use of log files. These files merely log visitors to the site – usually a standard procedure for hosting companies and a part of hosting services’ analytics. The information inside the log files includes internet protocol (IP) addresses, browser type, Internet Service Provider (ISP), date/time stamp, referring/exit pages, and possibly the number of clicks. This information is used to analyze trends, administer the site, track user’s movement around the site, and gather demographic information. IP addresses and other such information are not linked to any information that is personally identifiable.

Cookies: We also use cookies — small text files sent to Us by Your computer — and web beacons to store certain information. We may use cookies to authenticate Your identity, to determine if You are logged onto Our website, for personalization, for security, for targeted advertising, or for analysis of the performance of Our website and services. For example, cookies allow Us to recommend blog posts to You based on what You have read on Our site in the past. We use cookies that are not specific to Your account but unique enough to allow Us to analyze general trends and use, and to customize Your interaction with Our website. This information helps Us to understand the use of Our site and to improve Our website and service offerings.

We may use any or all of the following types of cookies:

Essential Cookies: These cookies help Us run Our website and improve Your experience with Our website. These cookies may allow content to load more quickly or allow You to access “members only” or repeat-users sections of Our website.

Functionality Cookies: These cookies allow Us to remember Your preferences from earlier visits to Our website, including login information, so that You do not have to input the same information multiple times.

Social Media Cookies: These cookies allow Us to record when You have engaged with a social media tool while visiting Our website. For example, We may record that You have “liked” a

certain aspect of Our website. The social media application may also share data with Us that You have allowed it to share. If You wish to change Your social media sharing settings, please visit the privacy settings of the social media network.

Advertising Cookies: We may work with third-party advertising partners who collect information about Your browsing habits on Our website in order to later display a relevant ad about Our services when You are on a third-party site such as a social media platform. These cookies may also allow Us to access Your location.

Pixel Tags: We may use a pixel tag, which is a small graphic file that allows Us to monitor the use of Our website and provide Us with information regarding Your interaction with the website. These tags may collect the IP address from the device You are using, and the browser type. Pixel tags are also used by Our third-party partners to collect information when You visit Our website, and We may use this information to display targeted advertisements.

Email Confirmations: We may receive email confirmations when You open an email from Us. This allows Us to determine if users are responding favourably to Our email communications and to improve those communications.

Other Technologies: Other data technologies may be used that collect comparable information for security, fraud detection, and similar purposes, to give Us information about Your use of Our website, and to greater improve Our website and service offerings to You.

WEBSITE ANALYTICS

We may partner with third-party analytic companies, including Google Analytics. The analytic companies may also use cookies (described above) or other tracking technologies to analyze visitors' use of Our website or mobile app to determine the popularity of the content, and better understand online activity. We do not transfer personal information to these third-party vendors. However, in order to access Our website, You must consent to the collection and use of Your information by these third-party analytic companies. You should review their Privacy Policy and contact them directly if You have questions. If You do not want any information to be collected and used by tracking technologies, visit the Network Advertising Initiative Opt-Out Tool or Digital Advertising Alliance Opt-Out Tool.

Google Analytics: You can opt-out of having Your activity on Our website made available to Google Analytics by installing the Google Analytics opt-out browser add-on. This add-on prevents Google Analytics from retrieving information about Your visits to Our website. For more information about Google's Privacy Policy, please visit: <https://policies.google.com/privacy>.

Facebook: You can opt-out of Facebook's interest-based ads.

You can learn more about Facebook's Privacy Policy at:

<https://www.facebook.com/help>

PROCESSING YOUR INFORMATION

For the most part, We do not process Your information in-house. However, We may, from time to time, process Your data internally. The legal basis for this processing is both Your consent to the processing, Our need to conduct Our legitimate business interests, and to comply with legal obligations. Our purposes in processing this information, if We do, is to administer, maintain, and improve Our website and offerings, to enter into contracts with You, to fulfil the terms of those contracts, to keep records of Our transactions and

interactions, to be able to provide You with goods and services, to comply with Our legal obligations, to obtain professional advice, and to protect the rights and interests of Our business, Our customers (including You), and any third parties. We may process the following data:

1. Data associated with Your account, such as Your name, address, email address, and payment information.
2. Data about Your usage of Our website, such as Your IP address, geographical information, and how long You accessed Our website and what You viewed.
3. Data related to Your personal profile, such as Your name, address, profile picture, interests and hobbies, or employment details.
4. Data that You provide Us in the course of using Our services.
5. Data that You post on Our website, such as comments or responses to blogs.
6. Data that You submit to Us when You make an inquiry regarding Our website or offerings.
7. Data related to Your transactions with Us, including Your purchase of Our goods or services. This information may include contact details and payment information.
8. Data that You provide to Us when You subscribe to Our emails or newsletters, including Your email address and contact information.
9. Data that You submit to Us via correspondence, such as when You email Us with questions.
10. Any other data identified in this policy, for the purpose of complying with Our legal obligations, or to protect the vital interests of You or any other natural person.

INTERNATIONAL DATA

Our website is hosted by servers located in The United States of America. Therefore, if You reside outside The United States of America, some of Your data will be transferred internationally to and stored on those servers. In addition, We may use third-party processors (including payment processors) and subcontractors located in the Republic of Cyprus. We use all reasonable methods to protect the safety of Your data during transfer, including hosting Our website on reputable servers and engaging reputable third-party processors. By using this site and providing Us with information, You consent to this transfer, processing, and storage of Your information in The United States of America. Note that the privacy laws in The United States of America may not be as strict as those in other countries. Please be aware that:

DATA RETENTION

We retain personal data as long as it is needed to conduct Our legitimate business purposes or to comply with Our legal obligations, or until You ask Us to delete Your data. For example, We will retain certain personal information indefinitely for the purposes of maintaining Your account, unless and until You delete Your account. Data that We gather for a specific and particular purpose, such as assisting law enforcement or analysing trends, will be kept for no longer than is necessary for that particular purpose. Data that is no longer needed by Us for any of the purposes listed above will be permanently deleted.

We will honour Your request to delete Your data, as described more fully below, unless We are required by law to retain access to the data. However, note that We cannot control the retention policies of third parties. If You wish to have any third parties, including those to whom We've transmitted Your data, delete that data, You will need to contact those third parties directly. You may request from Us a list of all third parties to whom We have transmitted Your data.

We may retain usage data (that is, data that is gathered by Our business or third-party analytics companies for the purpose of analysing the use of Our website) as needed for

internal analysis purposes. This type of data is usually retained for a shorter period of time than personal data, unless the data is necessary to improve the security or functionality of Our website or offerings, or We are legally obligated to retain the data for a longer period of time.

SECURITY OF YOUR INFORMATION

We take all reasonable steps to protect Your personal data and keep Your information secure. We use recognized online secure payment systems and implement generally accepted standards of security to protect against personal data loss or misuse. However, no security measure is foolproof, and no method of data transmission can be guaranteed against interception or misuse. We cannot guarantee complete security of any information You transmit to Us.

By consent to this Privacy Policy, You acknowledge that Your personal data may be available, via the internet, around the world. We cannot prevent the use or misuse of Your data by other parties.

We will notify You promptly of any known breach of Our security systems or Your data which might expose You to serious risk.

CHILDREN

This website or mobile app is not designed for use by children under age 18, and We do not knowingly solicit personal data from anyone under age 13. If You are under age 18, do not access or use Our website or related products or services. If You become aware that We have collected data of anyone under the age of 13, please contact Us so that We may delete that data.

SENSITIVE DATA

We request that You do not submit any sensitive data to Us, via public postings, email correspondence with Us, or any other method, including social security number, health data, genetic data, or information related to Your ethnic origin, religious beliefs, or criminal history. If You do send Us this information, then by doing so You are consenting to Our use, storage, and processing of this information in accordance with this privacy policy.

YOUR RIGHTS

You have certain rights with respect to Your personal data, as outlined below. Note that We may charge You a reasonable fee for actions that You ask Us to take with respect to Your data. In addition, We reserve the right to request that You provide Us with evidence of Your identity before We take any action with respect to the exercise of Your data rights. Further, Your rights may be restricted or nullified to the extent they conflict with Our compelling business interests, the public interest, or the law.

UPDATE ACCOUNT INFORMATION

You have the right to update or change any information You have provided to Us. To update or delete Your information, please contact Us at info@annabarulina.com

CONFIRM PERSONAL DATA AND ITS USE

You have the right to request that We confirm what data We hold about You, and for what purposes. You also have the right to confirmation of whether We process Your data or deliver Your data to third-party processors, and for what purposes. We will supply You with copies of Your personal data unless doing so would affect the rights and freedoms of others.

Change Consent: You have the right to change Your consent to Our use of Your information. In such cases, We may require You to delete Your account with Us, as described above, and You may not have full access to Our website.

Request a Copy of Data: You have the right to request a digital copy of the data that We hold about You. Your first request for a copy of Your personal data will be provided free of charge; subsequent requests will incur a reasonable fee.

Transfer Your Data: You have the right to request that We gather and transfer Your data to another controller, in a commonly used and machine readable format, unless doing so would cause Us an undue burden.

Delete All Data: You have the right to request that We delete all data that We hold about You, and We must delete such data without undue delay. There are exceptions to this right, such as when keeping Your data is required by law, is necessary to exercise the right of freedom of expression and information, is required for compliance with a legal obligation, or is necessary for the exercise or defence of legal claims. Such a request may result in a termination of Your account with Us and You may have limited or no use of Our website.

Emails and Communications: You may opt out of receiving future email correspondence from Us by checking the appropriate box when You register for the account or make a purchase. You may change Your communication settings by contacting Us at info@annabarulina.com

Marketing Communications: You may opt out of receiving any third-party marketing communications or having Your personal information used for marketing purposes. You may do this by contacting Us at info@annabarulina.com

Processing: You may, in some circumstances, restrict the processing of Your data, such as when You contest the accuracy of Your data or when You have objected to processing, pending the verification of that objection. When processing has been restricted, We will continue to store Your data but will not pass it on to third-party processors without Your consent, or as necessary to comply with legal obligations or protect Your rights or those of others or Our business. In addition, You may opt out of any processing of Your data altogether. Note, however that doing so may result in the termination of Your account and loss of access to Our website.

Complaints: If You are an EU resident, You have the right to complain to a supervising authority if You believe We are misusing Your data or have violated any of Your rights under this Privacy Policy or applicable law. You may do so in the EU member state in which You reside or have Your place of business or in which the alleged infringement took place. If You are located outside the EU, You may have rights under privacy laws in the jurisdiction where You live.

CYPRUS PRIVACY RIGHTS

In Cyprus, the Data Protection Law requires a privacy impact assessment to be conducted in a number of circumstances, including (i) before the transfer of sensitive personal data to a third country pursuant to an individual derogation under Article 49 of the *GDPR*; (ii) before the imposition of any restrictions on *data subject* rights or in order to obtain an exemption from the obligation to notify *data subjects* of a data breach, in the circumstances set out in the Data Protection Law; or (iii) before the combination of large scale filing systems of two or

more public authorities or bodies where sensitive personal data or data on criminal convictions or offences are involved or where the identity card number or other identifier of general application will be used.

On 31 July 2018 the national law providing for the protection of natural persons with regard to the processing of personal data and for the free movement of such data (Law 125(I)/2018), was published in the official gazette of the Cyprus Republic.

The law was adopted for the effective implementation of certain provisions of the Regulation (EE) 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 (GDPR), which applies as of 25 May 2018.

Upon entry into force of the provisions of the law 125(I)/2018, the Processing of Personal Data (Protection of Individuals) Law of 2001 (Law 138(I)/2001) was repealed.

Acts issued by the Commissioner under the provisions of the Processing of Personal Data (Protection of Individuals) Law, which is repealed, will continue to be valid until their expiration or replacement.

Any Cyprus' resident may request, free of charge, the personal information We have collected or stored about themselves or about a member of their household. For security purposes, We reserve the right to ask for verification of Your identity and proof of your Cyprus' residency at the time of your request.

Any Cyprus' resident has a right to request the personal data We have collected, or request deletion of the personal data We have collected, including but not limited to:

- Any personally identifying information, such as a real name, alias(es), mailing or resident address, IP address, email address, account name, biometrics, or any other data that could uniquely identify a California resident; and
- Commercial information, including products or services purchased, obtained, or considered, search history, interactions with Our website, or any other purchasing or browsing history of Our site and/or offer(s); and
- Site comments made publicly or privately; and
- Geolocation data; and
- Professional or employment-related information; and
- Education information.

We reserve the right to collect any of the above data on Cyprus' residents and their households.

We DO NOT plan on selling your data. Anna Barulina does not sell, rent or lease its customer lists to third parties.

Regardless, any Cyprus' resident can email us at info@annabarulina.com to explicitly request to opt-out of any such sale of data.

Cyprus' residents also have the option to request a full deletion of their account and any data We have collected and associated with them.

We agree to comply with any data request or deletion made pursuant to the GDPR in a reasonable timeframe, during normal business hours and excluding holidays or Our pre-scheduled time off.

NEWSLETTER PRIVACY

We offer the opportunity for You to volunteer certain information to Us that is used for email and marketing purposes. This information includes, but is not limited to, Your name and email. You will have an opportunity to unsubscribe from any future communications via email, but We reserve the right to maintain a database of past email subscribers. We reserve the right to use this information as reasonably necessary in Our business and as provided by law. Your information will be shared with reasonably necessary parties for the ordinary course of conducting Our business, such as through Facebook ads or Google Pay Per Click marketing campaigns. We do not ever sell Your information to third parties.

SECURITY OF YOUR PERSONAL INFORMATION

Anna Barulina secures your personal information from unauthorized access, use, or disclosure. Anna Barulina uses the following methods for this purpose:

- SSL Protocol

CHANGES TO THIS STATEMENT

Anna Barulina reserves the right to change this Privacy Policy from time to time. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address specified in your account, by placing a prominent notice on our site, and/or by updating any privacy information on this page. Your continued use of the Site and/or Services available through this Site after such modifications will constitute your: (a) acknowledgment of the modified Privacy Policy; and (b) agreement to abide and be bound by that Policy.

CONTACT INFORMATION

Anna Barulina welcomes your questions or comments regarding this Statement of Privacy. If you believe that Anna Barulina has not adhered to this Statement, please contact Anna Barulina at:

Email: info@annabarulina.com

Phone: +357 96363775

Address: 3 Zalongou street, 2682, Nicosia, Cyprus