

PRIVACY POLICY — ECARTA PLATFORM

Last updated: April 2026

This Privacy Policy explains how we, the team behind the "eCarta" platform (the "Platform", "we", "us"), collect, use, store, and protect the personal data of our Users ("you", "User") in accordance with Ukrainian law and the EU General Data Protection Regulation (GDPR, Regulation (EU) 2016/679).

1. DEFINITIONS

1.1 The following terms are used in this Privacy Policy:

1.1.1 **"Platform Administrator"** – the authorised persons who manage the Platform, organise the processing of personal data, determine its purposes and scope, and ensure its protection.

1.1.2 **"Platform"** – the online service available at <https://www.ecarta.com.ua/>, providing Users with access to metaphorical associative card functionality.

1.1.3 **"User"** – a natural person who has registered with or visits the Platform and who can be directly or indirectly identified by means of personal data.

1.1.4 **"Personal Data"** – any information that directly or indirectly identifies a natural person (e.g. name, email address, IP address, activity history).

1.1.5 **"Processing of Personal Data"** – any operation performed on personal data, including collection, storage, organisation, use, transfer, anonymisation, and deletion.

1.1.6 **"Confidentiality of Personal Data"** – the obligation of the Platform Administrator not to disclose personal data without a lawful basis or the User's consent.

1.1.7 **"Cookies"** – small data files stored in the User's browser to maintain sessions, preferences, and analytics.

1.1.8 **"IP Address"** – the unique network identifier of a device used to access the Internet.

2. DATA WE COLLECT

2.1 We may collect the following categories of personal data, either provided voluntarily by you or collected automatically during your use of the Platform:

2.1.1 **Identification data:** name, surname, email address, username (login), and password (stored in encrypted form).

2.1.2 **Technical data:** IP address, device type, operating system, browser type, interface language, date and time of login, and anonymised session data.

2.1.3 **Content data:** card decks you upload, saved sessions, notes, descriptions, comments, and other materials created or uploaded by you while using the Platform.

2.1.4 **Activity data:** pages visited, time spent on the Platform, and interactions with the interface (including via analytics tools).

2.1.5 **Financial data:** in the event of a purchase — payment details, transaction amount, and payment status. We do not store payment card data directly; this is processed by third-party payment service providers.

2.1.6 **Other data:** cookie-derived information, anonymised identifiers, and any other information you voluntarily provide via a contact form, email, or chat.

3. HOW WE USE YOUR DATA

3.1 We process your personal data solely to ensure the proper functioning of the Platform and the provision of our services. In particular, we may process your data for the following purposes:

- 3.1.1 creating and maintaining your User account;
- 3.1.2 providing access to Platform functionality;
- 3.1.3 technical support and communication with you;
- 3.1.4 sending system notifications (alerts, changes to terms, updates);
- 3.1.5 analysing activity to improve Platform performance;
- 3.1.6 protection against fraud, abuse, and unauthorised access;
- 3.1.7 compliance with legal obligations (e.g. payment record-keeping);
- 3.1.8 handling requests, enquiries, and complaints;
- 3.1.9 using anonymised data for analytical and statistical purposes.

4. LEGAL BASES FOR PROCESSING

4.1 We process your personal data only where we have a lawful basis to do so under Article 6 of the GDPR. Depending on the circumstances, we rely on the following legal bases:

- 4.1.1 Consent (Art. 6(1)(a) GDPR) — you have given clear and informed consent to the processing of your personal data for one or more specific purposes.
- 4.1.2 Performance of a contract (Art. 6(1)(b) GDPR) — processing is necessary to provide you with access to Platform functionality or to fulfil other contractual obligations.
- 4.1.3 Legal obligation (Art. 6(1)(c) GDPR) — we are required to process certain data in accordance with applicable law (e.g. retention of financial records).
- 4.1.4 Legitimate interests (Art. 6(1)(f) GDPR) — processing is necessary for our legitimate interests, such as improving functionality, fraud prevention, user communications, and analytics, provided these do not override your rights and interests.
- 4.1.5 Vital interests (Art. 6(1)(d) GDPR) — in exceptional circumstances, where processing is necessary to protect the vital interests of the User or another natural person.

5. DATA SHARING AND THIRD-PARTY RECIPIENTS

5.1 We do not sell or transfer your personal data to third parties, except as set out in this Policy or as required by law.

5.2 Data may be shared with the following categories of recipients:

- 5.2.1 Technical partners — companies providing us with hosting, email services, database management, image processing, and similar services. They have access only to the minimum information necessary to perform their functions and act as data processors under appropriate data processing agreements (DPAs) in accordance with Article 28 GDPR.
- 5.2.2 Payment service providers — for financial transactions, your payment details are transmitted to payment processors (e.g. Stripe, WayForPay, or others), which operate under their own privacy policies.
- 5.2.3 Analytics services — we may share limited anonymised data with services such as Google Analytics, Hotjar, and Kinde for the purposes of analysing interface interactions, improving UX, and enhancing Platform functionality.
- 5.2.4 Public authorities — where disclosure is required by applicable law (e.g. pursuant to a court order or regulatory request).

5.3 All third parties are required to maintain confidentiality and may not use personal data for any purpose other than that specified.

International transfers: Where personal data is transferred to recipients located outside the EEA (e.g. to service providers in third countries), we ensure that appropriate safeguards are in place, such as Standard Contractual Clauses (SCCs) adopted by the European Commission under Article 46(2)(c) GDPR, or we rely on an adequacy decision where applicable.

6. SECURITY OF PERSONAL DATA

6.1 We implement appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access.

6.2 These measures include, in particular:

- use of the HTTPS (SSL/TLS) secure protocol to encrypt data in transit;
- encryption of passwords and sensitive data at rest;
- access controls limiting data access to authorised personnel only;
- regular data backups and recovery testing;
- monitoring systems for suspicious activity and potential threats;
- authentication and access control policies;
- confidentiality agreements with staff and contractors.

6.3 We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, or as required by law. Retention periods may vary depending on the category of data and the purpose of processing.

6.4 Data breach notification: In the event of a personal data breach that is likely to result in a high risk to the rights and freedoms of Users, we will notify the competent supervisory authority within 72 hours of becoming aware of the breach, and will inform affected individuals without undue delay, in accordance with Articles 33 and 34 GDPR.

7. YOUR RIGHTS

7.1 Every User has the following rights in respect of their personal data under the GDPR and applicable Ukrainian law:

7.1.1 Right of access (Art. 15 GDPR) — you have the right to obtain confirmation of whether we process your data and, if so, to access that data and information about the processing.

7.1.2 Right to rectification (Art. 16 GDPR) — you have the right to request correction of inaccurate or incomplete personal data.

7.1.3 Right to erasure / 'right to be forgotten' (Art. 17 GDPR) — in circumstances defined by law, you have the right to request the deletion of your personal data.

7.1.4 Right to restriction of processing (Art. 18 GDPR) — you have the right to request that we restrict the processing of your data in certain circumstances.

7.1.5 Right to data portability (Art. 20 GDPR) — where processing is based on consent or contract and carried out by automated means, you have the right to receive your data in a structured, commonly used, machine-readable format.

7.1.6 Right to object (Art. 21 GDPR) — you have the right to object to processing based on legitimate interests, including profiling.

7.1.7 Right to withdraw consent (Art. 7(3) GDPR) — where processing is based on your consent, you may withdraw it at any time. Withdrawal does not affect the lawfulness of processing carried out prior to withdrawal.

7.1.8 Right to lodge a complaint (Art. 77 GDPR) — you have the right to lodge a complaint with the competent data protection supervisory authority in Ukraine or in any EU/EEA Member State.

To exercise any of the above rights, please contact us at: ecarta.co@gmail.com or ekartka.ua@gmail.com. We will respond within one month of receipt of your request, as required by Article 12 GDPR.

8. COOKIES, ANALYTICS, AND THIRD-PARTY SERVICES

8.1 We use cookies and similar technologies to ensure the proper operation of the Platform, personalise the interface, conduct analytics, support marketing activities, and improve the user experience.

8.2 Cookies are small text files stored on your device when you visit our Platform. They may be session cookies (deleted when the session ends) or persistent cookies (retained until deleted).

8.3 We may use the following types of cookies:

8.3.1 Strictly necessary cookies — required for the Platform to function; these cannot be disabled.

8.3.2 Analytical cookies — help us analyse traffic, User behaviour, and improve the service (e.g. via Google Analytics, Hotjar).

8.3.3 Functional cookies — remember your settings (language, region, etc.).

8.3.4 Marketing cookies — used for personalised advertising and tracking the effectiveness of marketing campaigns.

8.4 We also use third-party analytics services, such as Google Analytics, Hotjar, and Kinde, which may store their own cookies in accordance with their respective privacy policies.

8.5 You may change your cookie settings in your browser at any time — you can block or restrict the storage of cookies and delete previously stored cookies.

8.6 Cookie consent: Upon your first visit to the Platform, you will be presented with a cookie consent banner allowing you to grant or withdraw consent for non-essential cookies. You may manage your preferences at any time. In accordance with the ePrivacy Directive (2002/58/EC) and applicable GDPR requirements, non-essential cookies will only be placed with your prior consent.

9. CHANGES TO THIS POLICY

9.1 We reserve the right to update or amend this Privacy Policy periodically to reflect changes in legislation, technology, or Platform functionality.

9.2 The current version of the Policy is always available on the Platform. We indicate the date of the most recent update at the top of the document.

9.3 In the event of material changes, we will notify Users in advance by email notification or by displaying a prominent notice on the Platform, with a reasonable notice period before the changes take effect.

9.4 Your continued use of the Platform following any changes to the Policy constitutes your acceptance of the revised terms.

10. CONTACT

For any privacy-related enquiries, please contact us at: ecarta.co@gmail.com or ekartka.ua@gmail.com