

Privacy Policy

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Contents of the document

1. [General Provisions](#)
2. [What Is Personal Data?](#)
3. [What Data of the User Is Processed by the Administrator?](#)
4. [Under What Conditions Can the Administrator Process Children's Data?](#)
5. [On What Basis Does the Administrator Process Data? For What Purposes Does the Administrator Process Data?](#)
6. [How Long Can the Personal Data of the User Be Stored?](#)
7. [What Rights Does the User Have Regarding Their Personal Data?](#)
8. [What Are Cookies and How Do We Use Them?](#)
9. [With Who Do We Share Your Data?](#)
10. [Other Cases of Data Disclosure](#)
11. [When Can the Administrator Change the Terms of This Policy?](#)
12. [How Does the Administrator Protect Personal Data?](#)
13. [Contacting the Administrator or Data Protection Authority](#)

1. General Provisions

1.1. This Privacy Policy provides the User with information regarding their personal data processing by the administrator of the MEGOGO Media Service (hereinafter the "Media Service"), VASKIANI VENTURES LIMITED (hereinafter the "Administrator"), including the information required by Articles 13 and 14 of Regulation (EU) 2016/679 ("GDPR") on the protection of individuals concerning the processing of personal data (the "GDPR").

1.2. Please read this Privacy Policy carefully before using the Media Service, as personal data is collected, processed, used, stored, and transferred to third parties (including cross-border data transfer) during the use of the Media Service.

1.3. This Privacy Policy (hereinafter the "Policy") is an integral part of the User Agreement (hereinafter the "Agreement") between the Administrator and Users, available at <https://megogo.net/en/rules>.

1.4. The Controller of personal data of the Media Service Users is VASKIANI VENTURES LIMITED, located at Karditsis, flat 1 /office 102, Kaimakli, 1037 Nicosia, Cyprus.

1.5. For all questions regarding the processing (including collection, use, and storage) of personal data, as well as the transfer of personal data, Users may contact data.privacy@megogo.net.

1.6. According to the terms of the Agreement, exclusively on the territory of the Republic of Uzbekistan, the provision of the service of rebroadcasting TV channels is carried out by Megogo LLC, a legal entity registered and operating under the legislation of the Republic of Uzbekistan (hereinafter referred to as Megogo LLC), HOWEVER, the functions of the Media Service Administration and interaction with the User on any issues on the territory of the Republic of Uzbekistan is performed by

the Administrator in accordance with the provisions of the Agreement, which means that the personal data of the Users are not transferred or processed by Megogo LLC.

2. What Is Personal Data?

2.1. **Personal data (hereinafter the "Data")** means any information about the User that allows identifying the User, directly or indirectly. For example, their name, user ID in the Media Service, location information, online identifiers (indicators of the User's actions in the Service), or other information about the User.

3. What Data of the User Is Processed by the Administrator?

The Administrator may process different categories of User Data, namely:

3.1. Data provided by the User:

3.1.1 User's first and last names, nickname, email address, phone number, gender, age, photo (avatar), payment details, and payment methods. Such data you provide in several ways, for example, during registration and/or use of the Media Service, interaction with the support service, and/or participation in promotional activities carried out by the Administrator (both independently and with the help of partners).

3.1.2. Information provided when posting a review and/or "Like"/"Dislike" a particular piece of Content in the Media Service and/or other information provided by you when using the Media Service.

3.2. Data collected by the Administrator, including through cookies:

3.2.1. Data about the User's activity on the Media Service, such as browsing history, search history, etc.

3.2.2. Data about the type of device, model, and id of the device, its operating system, through which the Media Service is accessed; Internet browser, from which the Web version of the Media Service is accessed. In case when software applications of the Media Service are used on devices to access the Media Service, data on the location of the device (up to the city) is collected.

3.2.3 Details of the interaction with the support service, such as the date, time, and reason for the request, the transcript of any conversation with the support service employees, the phone number from which the call to the support service was made, and a record of such conversation.

3.2.4 Data our company receives through cookies, web beacons, and other similar technologies. You can read more about this in [the section about cookies](#).

3.2.5. Results of marketing activities.

3.3 Data received from other sources:

3.3.1. In case of registration in the Media Service via the User's social network account (the list of social networks whose account allows registration in the Media Service is specified on the User's registration page), the User agrees to transfer the Data necessary for the registration of the account in the Media Service (such as name, last name, email address, photo (avatar), social network user ID, date of birth) from the owner of such social network to the Administrator.

4. Under What Conditions Can the Administrator Process Children's Data?

4.1 Our Services shall only be used by children under the supervision of a parent or other legal guardian. The User shall be at least 18 years old (or the legal age of majority in the country in which they are located) to use the Media Service independently.

4.2 The User shall be adult enough to decide whether or not to provide their Data to the Administrator. If the User is under the age of 14 (or other age in accordance with the laws of the country of, the User's location), parent, guardian, or another legal representative shall provide or approve consent to the processing of their Data.

5. On What Basis Does the Administrator Process Data? For What Purposes Does the Administrator Process Data?

5.1 The legal basis for personal data processing shall be:

5.1.1. the processing for the purpose to provide, analyze, administer, improve and personalize the Media Service, i.e. for the execution of the User Agreement, in which the User is one of the parties, as well as in relation to the steps preceding the conclusion of the agreement as well as to perform registration of Users in the Media Service, receive payments from Users, and communicate with Users regarding the aforementioned (art. 6 (1) (b) GDPR).

Here you can meet some examples:

- Identification of Users within the use of the Media Service. The Administrator may use the information to confirm the User's access to the Media Service.
- Fulfillment of requests for Content, access to which is provided within the use of the Media Service.
- Individualization of the User's use of the Service, based on the User's behavior model and area of interest. The Administrator may carry out the profiling of personal data to increase the level of their relevance. Profiling shall mean any form of automated personal data processing, including the use of personal data for the evaluation of certain personal characteristics relating to an individual, in particular for the analysis or prediction of aspects related to this individual in the context of his/her activities during the use of the Media Service, personal preferences, interests, and location. The Administrator shall not make any decisions that might have legal or other important consequences for the User, including based on data profiling. Possible processing in automatic mode, including profiling, will be intended only for analysis and prediction of preferences of the User for preparation of individual offers to the User.
- Ensuring that important notices, such as changes in the User Agreement and/or Privacy Policy, are sent out.

5.1.2. the consent of the User to the processing of personal data (art. 6 (1) (a) GDPR);

Here you can meet some examples:

- Use of personal data to increase the relevance of advertising materials and more accurate targeting.
- We use cookies and similar technologies to provide content and the best user experience through user's device. For more information see [the section about cookies](#) and settings in our cookie-banner on user's device.

5.1.3. the legitimate interest of the Administrator to perform direct marketing, i. e. to send letters, SMS notifications, notifications via messengers (such as Viber, Telegram, etc.), push messages, and other notifications, in particular in the interface of Media Service, of information and advertising nature, as well as legal interest to counteract fraudulent actions, including those, connected with a test period of using the services of the Media Service (art. 6 (1) (f) GDPR).

Here you can meet some examples:

- Analysis and research of Users' actions within the Media Service to improve the quality of the services provided in the Media Service, as well as ways of cooperation with Users.
- Preventing fraudulent actions, including with a test period of using the Media Service's services.
- If a User participates in any promotional campaign, contest, or similar event, the Administrator has the right to use the information provided by Users to moderate such event.
- The Administrator may carry out the profiling of personal data to improve the quality of services. The Administrator shall not make any decisions that might have legal or other important consequences for the User, including based on data profiling. Possible processing in automatic mode, including profiling, will be intended only for analysis and prediction of preferences of the User for direct marketing.
- Informing Users about the appearance of new Content in the Service, promotions, or other news about the Media Service, by email, push messages, or other communication means. The User has the right to refuse to receive such information by independently turning off the function of receiving mailings by clicking on a special link indicated in the email; sending an email to the Administrator's email address data.privacy@megogo.net; turning off push notifications in the settings of mobile devices; blocking the receipt of messages in messenger applications.

6. How Long Can the Personal Data of the User Be Stored?

6.1 Our company shall not retain and process your data longer than is necessary to achieve the purposes for which it was collected. Retention periods are determined on a case-by-case basis and depend on such things as the type of data, why it is collected and processed, and the relevant legal or operational retention needs. Please note that we may also retain and use your information as necessary to comply with legal obligations, resolve disputes and enforce our agreements.

6.2 Once the retention period for processing your data has expired, our company may aggregate or delete data to the point where the User can no longer be identified and processed solely in statistical

form. Once safeguards against the risks of re-identification have been taken, the data is no longer considered personal, as it means that the User can no longer be identified.

7. What Rights Does the User Have Regarding Their Personal Data?

7.1 The User shall have the following rights concerning his/her personal data:

- demand from the controller to provide access to data relating to him or her, correct, delete or limit its processing; The right to delete profile including all personal data in it shall be exercised using the function https://megogo.net/en/deleting_profile.
- object to the processing of such processing is carried out based on the legitimate interest of the controller, including to object to processing for marketing purposes, including profiling related to direct marketing;
- to receive data in a structured, commonly used, and machine-readable format, and, if technically possible, to transfer it unhindered to another controller (so-called data portability);
- withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.
- file a complaint with the competent supervisory authority.

7.2 To exercise their rights, the User shall have the right to contact the Administrator by email – by writing to data.privacy@megogo.net.

7.3 If the User requests the deletion of Personal Data, the Administrator shall ensure the deletion of the account and the personal data associated with such account. The Administrator reserves the right to store payment data, which protects fraudulent interaction with the Media Service (including that associated with multiple activations of the test period of the Media Service's services).

7.4 The deletion of personal data may also be restricted by the requirements of applicable law. In particular, such restrictions may include the obligation of the Administrator to retain the information deleted by the User for the period prescribed by applicable law and to transfer such information by the legally established procedure to the state authority. In addition, the Administrator has the right to limit the right to deletion to protect their interests against every legal claim within the limitation period. If the right to delete data is restricted, the User may request that the Administrator restrict data processing to storage only.

7.5 The exercise of other rights may similarly be restricted by the requirements of applicable law.

7.6 The User's request to exercise the rights listed above will be evaluated, taking into account the circumstances of the particular case. Please note that the Administrator may store and use the information to comply with legal obligations, resolve disputes and enforce agreements, if necessary.

8. What Are Cookies and How Do We Use Them?

8.1. Cookies and other similar technologies may be used in the Media Service's web version, mobile applications, and advertisements. The abovementioned technologies help to store identification text

files, namely pieces of program code that allow the User to store information about the User and identify it when using the Media Service in the future.

8.2. Here is the list of the types of cookies placed by the Media Service and third parties. In addition to cookies, which are strictly necessary for providing the Media Service, they contain information about cookies, which may be used by third parties to assist the Administrator of the Media Service in providing the Media Service. Media Service cookies may be permanent, temporary, or session cookies. The number and names of cookies are subject to change. Consequently, the tables in the settings may be periodically updated to provide the User with the most current information.

Essential Cookies. These cookies are mandatory for the operation of the Media Service and cannot be disabled in the systems of the Media Service. They are set in response to actions performed by the User that are a request for services, such as setting, registering, logging in, or completing a profile. If the browser is configured to block these cookies, it will cause some parts of the Media Service may not work. Such Media Service's cookies include functionality, performance, and analytics cookies (e.g., content personalization, recommendation system without which the service is not provided; fraud monitoring), security cookies, user profile authentication cookies, and User session cookies on the Media Service.

Analytics cookies. These cookies collect information about how Users use the website, which pages Users visit most often, and whether they receive error messages from web pages. Also, these cookies are used to provide statistical information commonly used to measure performance and improvement. They are also known as "analytics". Analytics include activities such as counting page visits, dwell times, metrics, and preferences. Media Service's electronic communications may use "click-through URLs" that are associated with specific content in the Media Service and which take the User to the landing page when clicked. At this point, analytics data is also collected from the Media Service, as they provide information about the most popular topics and the level of interaction with the User. Sometimes analytics services are provided by third parties and specialized software that may use their own and third-party cookies. Some third-party software services embedded in the site may use analytics services to measure the effectiveness of the services. The Media Service uses Google Analytics, which allows us to count traffic and traffic sources to measure and improve the effectiveness of the Media Service. They help learn which pages are most and least popular and see how Users navigate the site. To view the privacy of Google Analytics cookies, click the link <https://support.google.com/analytics/answer/6004245>.

Targeting cookies. These cookies are used to provide advertisements that are more relevant to the User and the User's interests. For example, information about how certain Content is viewed using the User's computer or mobile device helps make the Media Service's advertising notifications and materials more relevant to the User's interests. In addition, special pixel tags make it possible to determine whether an email sent by the Service has been opened and read. Media Service may also use this information to reduce or eliminate emails. Targeted cookies are also used to determine the effectiveness of an advertising campaign. Targeted cookies may be set on the Media Service site by advertising partners. These cookies remember that the User has visited a particular Web site, and this information is shared with other entities, such as advertisers. If the User does not allow these cookies, the User shall still see generic advertising that is not based on the User's interests.

Third-party cookies. These cookies are set by third parties for marketing, analytical and functional purposes. For example, when authorizing by external social networks, certain cookies may be set for the functionality to work correctly. If such cookies are blocked, certain parts of the functionality of the service may not work correctly. The list and name of such cookies may be dynamically changed by the respective third party.

IAB Purpose Category. We process your data to deliver content or advertisements and measure the delivery of such content or advertisements to extract insights about our website. We share this information with our partners on the basis of consent and legitimate interest. You may exercise your right to consent or object to a legitimate interest, based on a specific purpose or at a partner level in the link under each purpose. These choices will be signaled to our vendors participating in the Transparency and Consent Framework (TCF).

8.3. The User can always limit the use of cookies or change the settings of cookies during the use of the Media Service and withdraw their consent by settings in cookie-banner on user's device. In addition, to change the settings of cookies, the User can use the settings of their Internet browser or mobile device. To do this, our company recommends you follow these links:

- [For Internet Explorer users;](#)
- [For Chrome users;](#)
- [For Safari web users](#) and [Safari on iPhone, iPad, and iPod touch users;](#)
- [For Firefox users;](#)
- [For Android users;](#)

9. With Who Do We Share Your Data?

9.1 To properly and efficiently provide services to the User, support the various functions of the Media Service and ensure its operation, provide marketing and promotional services, or perform transactions by bank card or other payment methods within the Media Service, our company enter into agreements with independent contractors and also cooperate with other service providers, companies and organizations. This engagement of contractors and service providers may include the transfer of User data to third parties.

9.2 In cases where data is transferred to a third party located in a country that does not provide an adequate level of data protection within the meaning of European Union law, the Administrator takes additional measures to protect User data, such as entering into data processing agreements based on standard data protection clauses adopted by the European Commission.

9.3. Among other things, we engage partner companies (hereinafter referred to as "Partners") in order to provide access to the Media Service, to provide technical support to Users and make decisions about improving the service to Users.

The Administrator provides Media Service services in the countries of the whole world where such a service is available, except for the territory of the countries of Ukraine and the Republic of Poland. Services for providing access to the MEGOGO Media Service in other countries can be provided to the

User by companies whose online services operate under domain names containing the <megogo> designation without restrictions on the hierarchy levels of such websites, as well as software applications).

In this case, the User will be automatically redirected to the relevant site and the User does not need to undergo additional registration in the specified online service, which saves the Users time and facilitates the Users access to such online services.

Information about these companies will be communicated to the User before the User starts using the services of such an online service using the user interface.

For example, on the territory of Ukraine, the Administrator of the MEGOGO online service is the Megogo Limited Liability Company (a legal entity registered and operating under the laws of Ukraine, registration number is 38347009), and on the territory of the Republic of Poland, the Administrator of the MEGOGO online service is the company limited liability company MEGOGO.PL (legal entity registered and operating under the laws of the Republic of Poland, registration number 0000985316).

The Administrator, for its part, does not grant Partners the right to further disclose Users' personal data or use data for any purpose other than in connection with the provision of services.

The Administrator and Partners act on the basis of agreements, and also take the necessary measures to ensure the protection and safety of Users' data.

9.4 Other third parties may also be engaged by the Administrator, for example, to provide marketing and advertising services or to carry out transactions by bank cards or other payment methods within the Media Service. The list of such third parties shall be provided by the Administrator after the User's written request.

9.5. Specifically including but not limited to, the Administrator may use:

9.5.1. the services of a data center, which processes data exclusively in encrypted form and guarantees the confidentiality of this data;

9.5.2. cloud platform services for SaaS solutions (SaaS means the software as a service);

9.5.3. Content Delivery Network (CDN) services allow to speed up content downloading significantly on the User's device;

9.5.4. services of other information and consulting service providers;

9.5.5. services of companies for analysis and statistical research of the use of the Media Service to improve the quality of the rendered services and operation of the Media Service, as well as targeting (personalization of display) of advertising materials and content recommendation system and providing the User with personalized and recommended services of the Media Service;

9.5.6. company services for communication with the User, including sending notices, requests, and information regarding the use of the Service and processing requests and applications from the User.

9.6 Please note that if you send messages to the Administrator on their official pages and accounts in such services and applications as Facebook, Instagram, Telegram, Viber, or iMessages or send a letter to the Administrator's email, you are using the services of these services and/or services of your email

operator at your own risk and agree that the providers of these services may have access to your personal data and are independent controllers of your data along with the Administrator. The Administrator shall have no control over the use of your personal data by the service providers listed in this article.

10. Other Cases of Data Disclosure

10.1 Personal data may also be disclosed in such cases:

10.1.1 The disclosure of information as ordered by the competent court or supervisory authority in cases provided by law.

10.1.2 With the User's consent to such disclosure.

10.1.3 In case of joint promotional activities with third parties. In this case, by participating in such promotional activities, the User provides their personal data to the Administrator and also to the Administrator's partners in such activities. Please note that third parties involved in carrying out promotional activities have their own policy of confidentiality and interaction with the Users' personal data and shall be responsible for its observance.

10.1.4 In the event of a reorganization, restructuring, merger, sale, or other transfer of assets, personal data may become part of the information transferred. The receiving party, in the event of such a transfer, undertakes to ensure a level of protection of personal data no less than that provided for in this Privacy Policy.

10.2 Our company also draws your attention that during the use of the Media Service, the User may disclose information about them and/or regarding the use of the Media Service by using "Share" plugins for certain social platforms (Facebook, Twitter), and terms of use of such buttons and plugins shall be directly subject to the privacy policy of these social platforms.

10.3 The data specified by the User in the profile, such as name, photo, and any social action (for example, commenting) within the Media Service will be freely available. That means that they can also be viewed by other users within or outside the Media Service (e.g. users, visitors to the Media Service, or users of third-party search engines).

11. When Can the Administrator Change the Terms of This Policy?

11.1. The Administrator reserves the right to change this Policy. In case the contents of the Policy change, the Administrator informs the User about the revised Policy. In case of changes that do not give the Administrator's rights to use the previously collected information, the Administrator shall request the User's consent regarding such use unless otherwise provided by the applicable legislation. In any case, the Administrator shall notify the User of such changes.

11.2. The Administrator undertakes to notify about the changes in the Policy and about the effective date of such changes in a proper and timely manner. The User may continue to use the Media Service only after they provide proper consent to such changes. The proper consent to such changes shall be the

continued use of the Media Service after receipt of the notification of changes. If the User refuses to accept any additions to the Privacy Policy, the User shall accordingly refuse to use the Media Service as well as contact the Administrator to have his/her account deleted.

12. How Does the Administrator Protect Personal Data?

12.1 The Administrator implements all necessary security measures necessary to protect the personal data of the User, for example:

- our company provides access to the data to a limited number of people and only when necessary;
- our company uses Hypertext Transfer Protocol Secure (HTTPS) so that the use of the Media Service over the Internet is secure;
- our company trains our staff to handle data securely. In particular, our company requires our employees and contractors to use strong passwords and include multi-factor authentication;
- our company enters into non-disclosure and data processing agreements with our employees and subcontractors;
- to protect against unauthorized access to data, our company applies a firewall, password hashing of Users, and the like;
- our company also backs up our data regularly so that our company can restore it when needed.

12.2 However, the Administrator cannot guarantee 100% security of all information that is transmitted and/or collected directly by the Administrator during the use of the Media Service, as no method of transmission via the Internet is completely safe. The Administrator cannot guarantee that the data will not be viewed, disclosed, or destroyed as a result of breaking or overcoming any security measures that have been taken by the Administrator.

13. Contacting the Administrator or Data Protection Authority

13.1. If you have any further questions or concerns about our Privacy Policy, you can always contact us by sending an email to data.privacy@megogo.net.

13.2. You can also file a complaint or contact the data protection authority according to your right under GDPR 13 (2d), 14 (2e).