

Privacy Policy

The purpose of this Privacy Policy (hereinafter referred to as the “**Policy**”) is to inform the user about what information may be collected by: IZABELLA FROLUSHKIN FZE (a company registered in Fujairah under registration number 6505/2015, with its registered office at Creative City Media Free Zone, Fujairah - Creative Tower, P.O. Box 4422, Fujairah, United Arab Emirates); (hereinafter referred to as “**we**”, “**us**”, “**our**”) from the user when visiting our website <https://affbay.com/> (hereinafter referred to as the “**site**”, “**this website**” or “**our website**”), how such information will be used by us, who such information may be shared with, the user’s choices regarding the collection, storage, use, disclosure, and protection of such information, the ability to edit, update, correct, or delete such information, and the security procedures we have implemented to protect the user’s privacy.

By accessing our website or using our services, you agree to the practices described in this Policy.

This Policy applies when we act as a data controller with respect to the user’s personal data and therefore determine the purposes and means of the processing of that personal data.

We make every effort to ensure that our processing of users’ personal data complies with the standards of the European Union’s General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 - GDPR), as we believe these are the highest data protection standards (regardless of whether the controller is registered).

If you do not agree to all the terms of this Policy, please do not use our Website.

Information Collection

We primarily obtain users’ personal data through the information they voluntarily provide to us.

We use this data to:

- create an account and provide services;
- communicate and provide customer support;
- marketing, if consent is given;
- comply with legal obligations.

Personal data collected directly from the user may include:

- full name (or username);

- email address;
- messaging app details (Telegram and WhatsApp);
- your professional experience;
- payment information.

However, if you do not wish to disclose your personal data to us, please do not provide it. This means we will be unable to provide the requested services.

In any case, by submitting your personal data on our website, you consent to the collection, processing, use, storage, and disclosure of your personal data.

We may also collect non-personally identifiable information when you visit the Website (e.g., IP address, geographic location, browser type and version, operating system, date and time of visit, pages viewed, time spent on the Website, usage patterns, etc.).

This information is non-personal and is collected and analyzed in aggregate to improve the operation and content of the Website. More details can be found in the cookie section below.

We may expand the list of personal data required from you by amending this Policy.

Use of Information

We use the information provided by the user for the following purposes:

- registering the user as a Publisher or Advertiser on our Website;
- providing the user with a personal account to use our services;
- communicating with you;
- understanding and meeting the user's needs and preferences;
- developing and improving new and existing service offerings;
- marketing purposes (adding the user to our email subscription list, sending promotional materials, offers via email advertising, etc.);
- monitoring and analyzing trends, statistics, usage, and activities related to our Website;
- complying with legal and regulatory requirements;
- fulfilling AML procedures.

Non-identifiable information may be used to analyze trends and statistics, improve the Website's functionality, and display content and advertising.

We may share your data with third parties under the following circumstances:

- Service providers: for payment processing, email distribution, and technical support.
- Legal requirements: to comply with legal obligations or protect our rights.
- Business transfer: in the event of a merger, sale, or acquisition.

Legal Grounds

All mentioned personal data and information may be processed based on the following legal grounds:

- Performance of a contract concluded with the user;
- Legitimate interest in monitoring and improving our Website and services and in the proper administration of our Website;
- Consent — for example, in connection with marketing purposes and sending the user any promotional materials.

Processing

We will process the user's personal data lawfully and fairly and will not use it for any purposes other than those we have informed the user of. We ensure, to the best of our ability, that all user personal data is accurate and up to date.

Personal data will be processed in the following life cycle: collection, systematization, accumulation, storage, updating (modification), use, dissemination (including transfer), depersonalization, blocking, destruction.

Your data may be transferred and processed in countries outside your jurisdiction. We ensure such data transfers comply with applicable data protection laws by applying appropriate safeguards.

Data Storage

We take reasonable steps to ensure the personal data we collect remains accurate, current, and secure. We implement various security measures such as encryption and authentication tools, in line with current technology, to protect the integrity and availability of your data.

These include:

- Strict access authorization criteria based on the “need to know” principle;
- Secure transfer of collected data;
- Storage of sensitive data on our secure servers;
- Use of firewalls to prevent unauthorized access;
- Continuous monitoring of IT systems to detect and prevent data misuse.

Industry-standard data protection measures include:

- Data encryption during transmission and storage;
- Access controls limiting access to authorized personnel only;
- Regular security audits and vulnerability assessments.

If you were provided with a password to access certain parts of our Website, you are responsible for keeping it confidential and complying with all other security procedures we may inform you of.

Do not share your password with anyone.

Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. While we strive to protect your personal data, we cannot guarantee or ensure complete security.

We are not liable for any losses you or any other person may suffer as a result of breaches of confidentiality regarding your use of the Website or information submitted to the Website.

We are also not responsible for data transmitted to or from us via the Internet or for any unauthorized access or use of that data. We cannot and do not guarantee that any information sent to or from us will not be intercepted, altered, or accessed unlawfully.

You agree not to hold us or our past, present, or future employees, directors, contractors, consultants, advisors, shareholders, suppliers, vendors, service providers, parent companies, subsidiaries, affiliates, agents, representatives, predecessors, successors, or assigns (collectively, “Our Parties”) liable for any loss or damage arising from the misuse, interception, modification, deletion, destruction, or use of information submitted via our Website.

Regarding any financial obligations or legal actions between us, we will retain your personal data until the end of the period during which legal actions or investigations may arise.

We will retain your personal data as long as necessary to fulfill the purpose for which it was initially collected. If you no longer want us to process your personal data, please contact us.

Disclosure of Personal Data

We may disclose information collected about the user if we believe it is necessary, including:

- to comply with legal obligations or legal proceedings involving us;
- to identify, contact, or take legal action against persons or entities causing harm to the user, us, or others;
- due to official investigations by government authorities;
- where required by law.

Access or Correction of User Information

Users may correct, update, or modify their personal data by emailing us or making the necessary changes in their personal account (feedback forms, chats).

Users may also request that their personal data be deleted from our database. Upon receiving an email requesting to stop processing, we will cease processing your data. Our contact information is listed below. We will make commercially reasonable efforts to honor such requests.

Users may also opt out of receiving promotional messages from us at any time by following the instructions in those messages. Even if you opt out of marketing emails, we may still send you non-promotional emails, such as technical notices, support messages, or updates about this Policy.

Users also have other data protection rights, including but not limited to:

- the right to access their personal data;
- to be informed of changes to the terms of this Policy before they take effect;
- the right to be forgotten;
- the right to restrict processing;
- the right to withdraw consent, if given.

In the case of requests, complaints, or claims regarding our data processing, please send them from the contact email address you provided on our Website to our contact email.

Your email must include:

- your full name and other personal data submitted on our Website to help us identify you;
- a description of the facts forming the basis of the request, claim, or complaint and its purpose (update, correction, deletion of data, or fulfillment of obligations).

We will respond to all requests within 14 days.

Before responding, we will verify your identity and locate your personal data in our database.

If the request or provided data is incomplete, we will request additional information, which must be submitted within 5 days of the original request.

Failure to provide the requested documentation within 5 days will be considered a withdrawal of the request.

Once we receive the completed request, the 14-day period restarts.

If a response cannot be provided within this timeframe, we will inform the user of the delay and the new response deadline, which will not exceed 30 days from the original due date.

Cookies

A cookie is a small piece of data sent from a website and stored on the user's device by their web browser while browsing.

Our Website uses cookies to distinguish you from other users. This helps us improve your experience, track your browsing habits, target ads that may be relevant to you, and improve our Website.

More information about cookies on our Website can be found in the popup during your first visit.

Most web browsers accept cookies by default. You may disable cookies via your browser's help menu.

Children's Protection

This Website is a general audience website, intended and directed toward individuals aged 18 and over.

We do not knowingly collect, use, or distribute any personal data from children under the age of 18.

If we become aware that personal data of a child under 18 has been collected, we will make reasonable efforts to delete it immediately.

Policy Modifications

This Policy may be modified periodically. We reserve the right to update this Privacy Policy at any time. Any changes will take effect immediately upon posting the latest version on our website.

We will notify you of updates and change the “Last Updated” date to reflect when the changes were made. We encourage you to review this statement regularly to stay informed about how we protect your personal data.

We may notify users of changes via email or private messages through our Website.

If you do not agree with the changes, please stop using the Website after the updated Policy is published.

By continuing to use the Website after changes are posted, you agree to all such changes.

Questions or Contact

If you have any questions about this Policy, please contact us at:

office@izabella-f.com

This Privacy Policy is effective as of July 1, 2025.