

# Paprika VPN – Privacy Policy

Last updated: May 19, 2024

This document reflects our policy in the field of processing (collection, storage and use) of information from users of the Paprika VPN service, including personal data, as well as the principle of protecting it and ensuring the rights of users when accessing their information, checking its accuracy, correcting and/or removal.

The person responsible for the processing of your personal data as described in this Privacy Policy is HIDE REALITY LTD (hereinafter referred to as the Company, when identified with the Service, also Paprika VPN), registration number HE 4590983, located at the address: Stratigou Timagia, 26, SIANTONA BUILDING, 1st floor, Flat/Office 102, 6047, Larnaca, Cyprus.

By visiting the Web-site, providing your personal data, downloading and installing software, as well as accessing, installing and/or using our Service, the User confirms that User has read this Privacy Policy and agrees to comply with its provisions.

If you do not agree to this Privacy Policy or any of its provisions, please do not use our Service or visit our Site or download, install or use our software.

The main objective of the Paprika VPN service is the security of the services provided, which includes the absence of collection of minimal information about users and its storage. Our company has created a unique service that has developed a mechanism for automatically clearing data on servers that no one has access to. You can not worry and remain completely safe in any country, wherever you are with our service. Paprika VPN does not have the technical ability to see your activity on the Internet.

Paprika VPN servers and data centers do not require any collection or storage of user personal data.

## Processing of personal data

To maintain the highest quality of service, Paprika VPN can see the volume of consumed traffic of the entire user base, since this data is necessary for analytics and the correct distribution of user traffic on servers for the best quality of service, but this does not imply the collection, storage and use of information such as VPN content, traffic, DNS queries and IP addresses that allow user identification.

Paprika VPN processes personal data to a limited extent solely to provide the Services, process payments for the Services and operate our Website and mobile application.

The company may process the following categories of personal data:

- When creating or changing an account, the User provides an email address, which is necessary to identify the user and provide him with paid services, to send confirmation emails during registration, to recover, change the password, receive

notifications from the Service, as well as receive information about promotions and discounts and other promotional materials;

- When the User subscribes to the Services, Paprika VPN processes certain subscription information (email address, subscription plan you selected, subscription expiration date, status, etc.);
- When you use paid Services, our payment processing partners process basic payment information to process payments and refund requests (date of purchase, payer IP address, credit card holder's full name, and credit card information). Paprika VPN may also process some of such payment information (date of purchase, User ID in the Service, etc.) or when the User provides their payment details to us directly;
- When a User pays for our paid Services, we may process information about the User's country from which the purchase is made if this is necessary to calculate tax, such as value added tax.

In order to prevent fraudulent payments for the Services, the User's personal information (email address, device information) may be verified using our anti-fraud tools and/or our payment processing partners. A payment transaction that is considered high-risk may be rejected by the Company.

Paprika VPN may use the User's email address to: respond to User requests; sending the User important updates and announcements related to the use of the Service, the Site; sending offers, surveys and other marketing content, which the User can refuse at any time.

Paprika VPN may store information that the User provides to customer support that is necessary to resolve the request. Depending on the request being resolved, such information may include payment information for User verification processes, the name of the User's country, information about the User's operating system.

The Company may use various tools to optimize the email marketing experience, which can track the actions the User takes with the email, such as whether the email is opened or whether or not it is unsubscribed. Paprika VPN can also see the User's device operating system and country to optimize push notifications, email notifications and automatically set the language.

When the User contacts you through a chatbot on the Site, in addition to processing contact information, Paprika VPN may collect information about the User's device and IP address.

Paprika VPN does not collect logs of your online activity while you are connected to our Service, including browsing history, traffic direction, data content, or DNS queries. We do not store connection logs, meaning we do not store logs of your IP address, VPN outgoing IP address, connection timestamp, or session duration.

Paprika VPN uses device information (including device type, operating system/language or user agent, and mobile identifiers provided by Android or iOS devices) to create statistics related to marketing channels and advertising partners through which users learned about Paprika VPN apps and subscribed to them. This device information does not contain your name, email address, or other personal information. Users can disable or reset mobile identifiers associated with their devices at any time, for instructions see Apple's page on

advertising and privacy on iOS devices and Google's page on managing Google settings on your Android device.

The Web-site may contain links to third-party Internet resources that may collect personal information about you. These services are not owned by Paprika VPN, so please review their own privacy policies to control your information.

Paprika VPN uses cookies and mobile identifiers for reporting and analytics, but this does not directly identify users or their personal information.

You can change or disable your cookie settings at any time. We remind you that in this case the Site may stop working properly.

Cookies allow you to determine your preferred language and marketing channel through which you came to the Site and demonstrate secure information about your account, but they do not contain information that can directly identify the User, as well as his other personal data.

Paprika VPN uses third party cookies for basic, functional and marketing purposes.

Cookies that are necessary for the proper functioning and optimization of the Site are known as Essential Cookies. Other essential cookies that are used include those that enable subscription payments to be made through a partner; those that allow us to analyze and improve page performance, including Google Analytics, Google Optimize, Visual Website Optimizer and Google Tag Manager; those that allow us to manage traffic, deliver content and fight malicious bots, including Cloudflare, Cloudfront and Gstatic; and one that allows you to indicate your cookie preferences, Usercentric's consent management platform.

Essential cookies cannot be disabled, and by using the Site you agree to them.

Cookies that enable us to correctly display or operate elements on the Site are known as functional cookies. For example, we use Google fonts to display text correctly. Other functional cookies used include cookies for video display, including YouTube Video and Vzaar; those that create maps, including OpenStreetMap and Google Maps; those used when managing cookies, including Google Ajax and jQuery; one for tracking and reporting errors, Sentry; one for displaying avatars, Gravatar; and one for submitting quizzes and questionnaires, Typeform. Functional cookies can be disabled.

Cookies that are used by advertisers to show advertisements relevant to your interests are known as marketing cookies. For example, we use Google Ads Remarketing to display advertisements on third-party websites (including Google) to users who have visited our Site. We may display advertisements to these users on a Google search results page or on a site on the Google Display Network. Other marketing cookies used include cookies from DoubleClick Ad, Facebook Pixel, Facebook Social Plugins, Google AdServices, Google Syndication, Microsoft Advertising Remarketing and PayPal Marketing Solutions. Marketing cookies can be disabled.

Service providers, including Google, use cookies to serve ads based on someone's past visits to the Site. Any data collected will be used in accordance with our Privacy Policy and Google's Privacy Policy. In addition to adjusting your cookie preferences through your browser or the menu at the bottom of our Site, User may also opt out of Google's use of cookies by visiting Google's advertising opt-out page. User may opt out of Google Analytics by visiting the Google Analytics opt-out page. The user may opt out of the use of cookies by third parties by visiting the Network Advertising Initiative opt-out page.

### **Grounds for processing personal data**

Paprika VPN may process personal data to fulfill the obligation with the User: to provide access to the Service; to process your purchase transactions; to ensure safe, reliable and trouble-free operation of our Service and Website.

Paprika VPN may process personal data to fulfill its legal obligations to process certain data, for example to maintain and process records for tax and accounting purposes.

Paprika VPN may process personal data if you have given your consent to the processing of personal data, for example in the following cases: sending marketing communications, unless applicable law does not allow contacting you without your prior consent; Communicate with you and manage your participation in Paprika VPN offers, recommendations or promotions. If applicable law allows us to contact you without your specific consent, you may opt out of receiving marketing communications.

Paprika VPN may process personal data lawfully in accordance with the legitimate interests of Paprika VPN or the interests of third parties. This includes: identifying, preventing, or otherwise addressing issues related to fraud, abuse, security, or technical problems with our Service and Site; protect against damage to the rights, property and safety of Paprika VPN, other users or third parties; improve or maintain the Services and provide new products and features; conducting business negotiations with you; obtaining information about the use of our Site and Service (crash reports, App Store reviews, information about the channel from which our application was downloaded, etc.).

### **Transfer of personal data**

Paprika VPN does not share your personal data with third parties, except as described in this Privacy Policy or as required by law.

Paprika VPN may use third party service providers to assist us with various operations, such as payment processing, email automation, Site diagnostics, Application diagnostics, analytics and others. As a result, some of these service providers may process personal data for the required period, to the extent and solely for the purposes necessary to provide us with the relevant services.

Paprika VPN may partner with third parties to display advertising on the Service, to manage our advertising on other sites. Typically, these partners help deliver more relevant advertising and promotional messages, which may include behavioral, contextual and general

advertising. We and our advertising partners may process certain personal data to help us understand your preferences so that we can provide advertising that is more relevant to you.

Your personal data may be processed in any country in which we may interact with service providers and partners. When you use our Service and Site, you understand and acknowledge that your personal data may be transferred outside the country in which you reside.

If Paprika VPN sells a subscription that includes third party services purchased through Paprika VPN, you agree that certain purchase information (your email address, subscription expiration date, payment amount, subscription ID) will be shared with the applicable third party provider services for the purpose of activation, administration and provision of third party services. When you use third-party services, your personal data is processed by the third-party service provider, which acts as a separate controller of your personal data in accordance with its procedures and is subject to its privacy policy.

Paprika VPN may disclose personal information to establish or exercise the Company's legal rights or defend against complaints or any legal action. Paprika VPN may share such information as we believe is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, and violations of our Terms and Conditions.

Paprika VPN may transfer personal data in the event of the sale of assets or a portion of assets, the sale of a business or negotiations for the sale of a business, or the conduct of corporate mergers, acquisitions, consolidations, reorganizations or similar events. In these situations, Paprika VPN will continue to ensure the confidentiality of personal information.

Any request for user data must be made in accordance with the appropriate formal legal procedure recognized by the laws of the Republic of Cyprus (letter of letters, mutual legal assistance treaty, etc.). Paprika VPN will carefully review each request to ensure that it complies with the laws applicable to the Company, the laws of the requesting country, international regulations and our internal policies. In cases where, after appropriate legal process, it is subject to execution and identification of a specific individual is possible, the Company will provide limited data processed in accordance with this Privacy Policy and subject to the request.

To enable the use of our Service and Site, we may store, access and transfer personal data from around the world, including from countries where Paprika VPN operates. We evaluate the circumstances surrounding all cross-border data transfers and apply appropriate safeguards to ensure that personal data is protected in accordance with this Privacy Policy.

### **Updating, correction, storage and deletion of personal data**

Different jurisdictions have different data protection laws that provide you with rights as a data subject.

Subject to these applicable laws, you may have the following rights:

- You have the right to access personal data held about you,

- You have the right to request restrictions or object to the processing of your personal data,
- You have the right to request and receive your personal data in a commonly used format (data portability),
- You have the right to withdraw your consent on which the processing is based at any time,
- You can exercise your rights above by contacting us,
- You have the right to lodge a complaint with the authorized body for the supervision of personal data protection.
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If you would like to edit your profile information (for example, change your email address, etc.), delete your account, or contact Paprika VPN regarding other personal data processing issues, you can contact Paprika VPN support at the email address: [support@paprikavpn.com](mailto:support@paprikavpn.com).

You will be required to verify that you are the account owner before we take further action on your request.

You may ask a third party to submit a request on your behalf as an authorized person. To confirm that an authorized person has the authority to make a request on your behalf, they must have a written authorization (power of attorney) signed by you, and you must provide us with a copy of the specified document. To ensure your privacy and security, we may take further steps to verify your identity.

Please note that there may be times when we retain information associated with you after the expiration or termination of your account and/or subscription: Paprika VPN may retain information associated with you to fulfill its obligations under as required by applicable law, court orders, other legal procedures, for archival purposes.

You can control the use of cookies at the individual browser level on your device. To block or disable cookies, follow your browser instructions.

If you do not agree with the processing of your personal data by the Company, please do not use our Service and Website.

You may request that we cease processing your personal data, in which case your data will only be processed to the extent necessary to terminate your use of the Services and complete Paprika VPN's other legal relationship with you, including record keeping, accounting and etc. Please note that the Company or our third party service providers may be required to retain certain of your personal information as required by law.

Paprika VPN will only retain your personal data for as long as necessary to provide you with the Services, or for as long as we have other lawful reasons to do so, but no longer than is permitted or required by law.

The User's subscription payment information may be retained by Paprika VPN for a period of 10 years from the date of the last payment transaction. Paprika VPN will use your email for

marketing communications for a period of 1 year after the end of your subscription or until you exercise your right to opt-out, whichever occurs first.

Once the legal basis for storing personal data ceases, it will either be securely deleted or anonymized through appropriate means. Paprika VPN will destroy personal data recorded or stored as electronic files using methods that would prevent data recovery.

## **Data Security**

Paprika VPN's principles include the use of advanced personal data protection technologies, responsible internal procedures and technical security measures for our staff and offices to prevent the loss or misuse of Users' personal data. We believe our systems are secure, but it is important to understand that no data security measure in the world can provide absolute protection. For this reason, our guiding principle is to collect the minimum amount of data.

The company controls access to its facilities and uses security alarm and video surveillance systems, stores devices with personal data only in locked rooms or cabinets, and adheres to a cleanliness policy in the workplace.

Paprika VPN uses multi-layered protection with firewalls, anti-malware, and intrusion detection and prevention systems. Our infrastructure is regularly updated and regular vulnerability scans are conducted to identify possible vulnerabilities, leaks, and we correlate and analyze signals in security tools. The servers are secure and no data center requires us to collect or store any traffic data or personal information related to your use of the Services.

The User's personal data, which never includes any sensitive data such as browsing history, DNS queries or IP addresses associated with this information or any other online behavior, is stored for a limited period in accordance with applicable law on data protection (provided that we have your consent or a legal reason for storing such data). You can request deletion of your data by sending us a deletion request. Please note that if you request deletion of your personal data, you will no longer be able to use the Services.

Paprika VPN follows best practices in information security policies and data processing. The company constantly raises the awareness of its employees about security and data protection, conducts educational seminars, trainings and other awareness-raising events. We analyze threats and attacks and constantly update our security measures.

If Paprika VPN detects anything suspicious, the User will be immediately informed about ways to provide better protection. However, no company can guarantee the absolute security of Internet communications, since no technology is completely secure. By using the Service and the Site, you expressly acknowledge that Paprika VPN cannot guarantee 100% security of personal information provided or received by us through the Service, and that any information received from you through the Site or our Service is provided at your own risk. If you have any reason to believe that your interaction with us is not secure, please let us know.

## **For Users in the European Union**

Paprika VPN is committed to protecting the privacy of users around the world, and our current practices reflect this by keeping data collection to a minimum and ensuring Users have control over their personal data. The General Data Protection Regulation (“GDPR”) of the European Union (“EU”) requires us to specifically define this practice for users in the EU.

In accordance with the GDPR, we collect and process Personal Data identified in this Privacy Policy on one of the following basis, as applicable:

- In order to fulfill our contractual obligations, including:
  - providing Users with the Services they have requested,
  - manage subscriptions and process payments in connection with our Services,
  - providing customer support.
  
- For legitimate interest in running our business, including:
  - improving the quality, reliability and efficiency of our Services,
  - communicating with customers to provide information and receive feedback regarding our Services,
  - with the consent of Users, which Users can revoke at any time.

## **For users in California**

If you reside in California, you may exercise your rights under the California Consumer Privacy Act (CCPA) by contacting us through Customer Service. As defined in the CCPA, please note that Paprika VPN does not sell, share, or rent your personal information.

## **Use of the service by minors**

Paprika VPN Services are not intended for use by persons under the age of 18 or the age of majority under the laws of the country in which they reside.

If you belong to the above categories of persons, then do not provide any personal information without the consent of your parents or legal guardians.

If the Paprika VPN service receives information that personal data has been provided illegally, it reserves the right to delete it.

## **Changes to the Privacy Policy**

Paprika VPN's privacy policy is subject to change. The Company may change its Privacy Policy from time to time, with or without notice to users, in accordance with applicable laws and privacy principles.

If you continue to use the Service or visit the Site, this means your acceptance of this Policy in the updated version.



## **Contacts**

All questions regarding this Privacy Policy can be asked by contacting the email address: [support@paprikavpn.com](mailto:support@paprikavpn.com).

If you have any questions, concerns or complaints regarding our Privacy Policy, our compliance with the law or how we process your information, or if you wish to exercise your privacy rights, please contact us at the above email address.