

PRIVACY POLICY

Who we are

INSURS ONLINE LLC, USREOU code 44272770, registered address: Ukraine, Kyiv, 5 Dilova Street, Building 2V1 (hereinafter - “we”, “us”, “our website”), is the personal data controller (the “Controller”) in respect of the personal data processed within the website agent.insurs.online and affiliate.insurs.online.

Contact for questions concerning the processing of personal data: support@insurs.online

1. General provisions

The privacy of the users of our website is of great importance to us, and we make every effort to ensure its protection. This Policy explains what personal data we collect, on what legal grounds and for what purposes we process it, to whom we may disclose it, how long we retain it, and what rights you have.

Cookies that are not strictly necessary for the operation of the website are placed only after obtaining your explicit consent via the cookie management banner (see Section 11 for details), and not automatically upon your first visit to the website.

2. Personal data we collect

We may collect, store, and use the following categories of personal data:

- information about your device, including your IP address, approximate geographic location, and the type and version of your browser and operating system;
- information about your visits to, and use of, this website, including referral sources, the duration of visits, the pages viewed, and your navigation paths through the website;
- the email address you provided when completing the contact form on the website;
- information you provided when creating a profile on the website - your name, profile picture, gender, date of birth, marital status, hobbies and interests, education, and place of employment;
- the name and email address provided when subscribing to newsletters and/or notifications;
- information you enter when using the services available on our website;
- technical information generated during your use of the website, including the time, frequency, and conditions of use;
- information about purchases you have made, services used, or transactions carried out, including your name, address, telephone number, email address, and payment method information (card details are processed by the payment provider and are not stored on our servers);
- information you have posted on the website for the purpose of publication on the Internet, including your username, profile picture, and the content of the posting;
- the content and metadata of messages sent to us by email or through the website;
- any other personal information you have sent us.

If you provide us with the personal data of a third party, you confirm that you have obtained that person's consent both to the disclosure and to the further processing of their data in accordance with this Policy.

3. Legal grounds for processing personal data

We process your personal data on the following legal grounds:

- your consent (Article 11 of the Law of Ukraine “On Personal Data Protection”; Article 6(1)(a) GDPR) - in particular, for newsletters, marketing communications, and optional cookies;
- the necessity to perform a contract with you, or to take steps at your request prior to entering into a contract (Article 6(1)(b) GDPR) - in particular, for processing orders and providing services;
- the necessity to comply with our legal obligations (Article 6(1)(c) GDPR) - in particular, for the purposes of interaction with insurers, accounting, taxation, and responding to lawful requests of public authorities;

- our legitimate interest, or the legitimate interest of a third party (Article 6(1)(f) GDPR), provided that such interest is not overridden by your interests or fundamental rights - in particular, for ensuring the security of the website, preventing fraud, and basic web analytics.

You have the right to withdraw your consent at any time; this does not affect the lawfulness of the processing carried out on the basis of consent before its withdrawal.

Providing the personal data necessary for the conclusion and performance of a contract with you (for example, when arranging a quote) or for compliance with legal obligations established by law is a mandatory requirement: if you do not provide such data, we may be unable to conclude or perform a contract with you, or to provide the requested service. Providing personal data on the basis of consent (for example, to receive newsletters or marketing communications), by contrast, is voluntary, and refusal to provide it has no consequences other than the inability to use the relevant service or feature.

4. Purposes of processing personal data

We may use your personal data to:

- administer the website and our business activities;
- personalize the website for you;
- enable you to use the services available on the website;
- perform agency services arranged through the website, and provide paid services;
- send invoices and payment reminders, and receive payments;
- send insurers' proposals, insurance contracts, and other mandatory documents pursuant to the Law of Ukraine "On Insurance", the Law of Ukraine "On Electronic Commerce", and other applicable legislation;
- send emails that you have specifically requested;
- send newsletters, if you have subscribed to them (you may unsubscribe at any time);
- send marketing communications about our activities or the activities of carefully selected partners, if you have given separate consent to this;
- provide statistical information to third parties in a form that does not permit the identification of an individual user;
- process inquiries and complaints relating to the website;
- ensure the security of the website and prevent fraud;
- verify compliance with the terms of use of the website;
- other purposes, of which we will separately notify you at the time the data is collected.

5. Disclosure of personal data to third parties

Without your explicit, prior consent, we will not transfer your personal data to any third party for the direct marketing purposes of this or any other company.

We may disclose your personal data to:

- our employees, managers, insurers, banks and payment systems, professional advisers, agents, and service providers (processors) acting under a personal data processing agreement and to the extent necessary for the provision of services to us;
- companies within our group, to the extent and for the purposes defined by this Policy;
- where required to do so by law;
- in connection with current or possible legal proceedings;
- for the purpose of establishing, exercising, or defending our legal rights, including the prevention of fraud or the reduction of credit risk;
- a buyer (or prospective buyer) of a business or assets that we are selling or intend to sell;
- any court or competent authority, where we reasonably believe that such authority may order the disclosure of such data.

We do not disclose personal data to third parties beyond the cases specified in this Policy.

6. Transfer of personal data outside Ukraine and the European Economic Area

INSURS Online may process, store, and transfer personal data within the countries in which the company's servers and service providers are actually located. The description below describes the mechanisms rather than specific countries: the recipient country is recognized by the European Commission as ensuring an adequate level of protection of personal data (an adequacy decision under Article 45 GDPR). Such countries and territories include, in particular: Andorra, Argentina, Brazil, Guernsey, Israel, Jersey, Canada (commercial organizations only), New Zealand, the Isle of Man, South Korea, the United Kingdom, Uruguay, the Faroe Islands, Switzerland, and Japan, as well as organizations in the USA that are self-certified under the EU-U.S. Data Privacy Framework. This list is periodically reviewed by the European Commission - please check the official website of the European Commission for the current version.

- in the absence of an adequacy decision - standard contractual clauses (Standard Contractual Clauses) approved by the European Commission, or another mechanism provided for in Article 46 GDPR;
- your explicit, separate consent to the transfer of data to a specific country - where none of the mechanisms listed above is applicable and the law permits reliance on consent.

In accordance with Article 29 of the Law of Ukraine “On Personal Data Protection”, the cross-border transfer of personal data to states that do not ensure an adequate level of protection is carried out with the written consent of the data subject or on other grounds provided for by law.

7. Personal data retention period

Personal data processed for a specific purpose is not retained for longer than is necessary to achieve that purpose. Approximate retention periods (subject to clarification in accordance with the company's actual practice):

Data category	Approximate retention period
User account data	until the account is deleted by the user
Accounting and tax records	the period established by the tax and accounting legislation of Ukraine, which is subject to change
Data for marketing mailings	until consent to receive mailings is withdrawn
Analytical cookies	up to 14 months from the date of installation
Advertising (marketing) cookies	up to 13 months from the date of installation
Security and fraud-prevention logs	up to 12 months
User inquiries and complaints	3 years from the resolution of the inquiry

We continue to retain documents containing personal data beyond the periods specified above where: this is required by the Law of Ukraine “On Insurance”; the documents may be relevant to current or possible legal proceedings; or this is necessary for the establishment, exercise, or defense of our legal rights, including the prevention of fraud.

8. Protection of personal data

We take appropriate technical and organizational measures to prevent the loss, unlawful use, or unauthorized alteration of your personal data, including through the use of secure, password- and firewall-protected servers, and the encryption of electronic financial transactions.

Information is transmitted over the Internet via encrypted SSL channels.

We will never ask you for your password, other than when logging into an account on our website.

In the event of a personal data breach that may create a risk to your rights and freedoms, we will notify the competent supervisory authority without undue delay (where feasible, within 72 hours of becoming aware of it,

in accordance with Article 33 GDPR), and, in cases of high risk, we will also notify you directly, in accordance with Article 34 GDPR.

9. Your rights

You have the following rights in respect of your personal data under the Law of Ukraine “On Personal Data Protection” and the GDPR:

- the right of access - to obtain confirmation as to whether your data is being processed, and a copy of it;
- the right to rectification - to require the correction of inaccurate personal data, or the completion of incomplete personal data;
- the right to erasure (the “right to be forgotten”) - to require the deletion of your personal data where grounds provided for by law exist;
- the right to restriction of processing - to require the temporary restriction of the processing of your data under certain conditions;
- the right to data portability - to receive the data you have provided in a structured, commonly used, machine-readable format, and to transmit it to another controller;
- the right to object to processing - including the right to object at any time to the processing of your data for direct marketing purposes, which is absolute and requires no justification;
- the right to withdraw consent at any time, without affecting the lawfulness of processing carried out beforehand;
- rights relating to automated decision-making, including profiling, which produces legal effects concerning you - in particular, the right to require human involvement in the making of such a decision;
- the right to lodge a complaint with a supervisory authority: in Ukraine - with the Ukrainian Parliament Commissioner for Human Rights (in respect of personal data protection); in the European Union - with the national personal data protection authority of the country of your residence, place of work, or the place of the alleged infringement;
- the right to apply to a court for the protection of your rights.

To exercise any of these rights, please contact support@insurs.online. We will respond to your request without undue delay and, as a general rule, within one month of receipt of the request. We may ask you to verify your identity before granting access to the data.

10. Personal data of minors

Our website is not intended for persons under the age of 18 (please specify the actual age threshold applicable to your service - under the GDPR, the default age at which a child may consent to information society services on their own behalf is 16, although EU member states may set a lower threshold, not below 13). We do not knowingly collect the personal data of minors without the consent of their parents or legal representatives. If we become aware that we have obtained the personal data of a minor without proper consent, we will take steps to delete such information.

11. Cookies

Our website uses cookies. A cookie is a small file containing an identifier (a string of letters and digits) that a web server sends to a web browser and that the browser stores. The identifier is subsequently sent back to the server each time the browser requests a page from that server. Cookies may be “persistent” (retained by the browser until they expire or are deleted by the user) or “session” cookies (deleted at the end of the session with the website or upon closing the browser).

We use both session and persistent cookies. Strictly necessary cookies are set automatically, since the website cannot function properly without them. The remaining cookies (functional, analytical, advertising) are set only after obtaining your explicit consent via the cookie management banner that appears on your first visit to the website. You may change your choice at any time using [\[link to the cookie settings on the website\]](#).

The use of cookies and similar technologies is also governed by Section XV, “Confidentiality of Electronic Communications Services,” of the Law of Ukraine “On Electronic Communications” of 16 December 2020, No. 1089-IX; we recommend additionally verifying that this section of the Policy complies with its requirements.

Categories of cookies we use

Category	Examples	Type	Purpose	Consent
Strictly necessary	session identifier, authentication token, saved cookie choice, shopping cart	session / persistent	ensuring the basic operation of the website, security, and preservation of the state of the cart	not required
Functional	language selection, regional settings	persistent	remembering your settings	yes
Analytical	Google Analytics (<code>_ga</code> , <code>_ga_*</code> , <code>_gid</code>)	persistent, up to 14 months	analysis of website usage, visit statistics, improving usability	yes
Advertising / marketing	Google Ads (<code>_gcl_a</code> , <code>IDE</code> , <code>test_cookie</code>)	persistent, up to 13 months	remarketing, personalized advertising, measuring advertising effectiveness	yes

We use Google Analytics and Google Ads to recognize the user's device for the following purposes (depending on the consent you have given): tracking navigation of the website; use of the shopping cart; improving the usability of the website; analyzing website usage; administering the website; preventing fraud and enhancing security; personalizing the website for each user; and displaying targeted advertising that may be of interest to individual users.

Managing cookies in your browser

Most browsers allow you to manage cookies through their privacy settings: as a rule, this involves going to the browser's settings menu → “Privacy and Security” (or a similar section) → “Cookies and Site Data,” where you can block or delete cookies entirely or selectively. Since the interface varies depending on the browser version, we recommend looking up up-to-date instructions in the official help resources of your browser (for example, Google Chrome, Mozilla Firefox, Safari, Microsoft Edge).

Please note: blocking or deleting cookies may adversely affect the usability of many websites, including ours, and may result in some functions of the website becoming unavailable.

12. Hyperlinks to third-party websites

Our website may contain hyperlinks to, and details of, third-party websites. We do not control these websites and are not responsible for their privacy policies or personal data processing practices. We recommend reviewing the privacy policies of such websites separately.

13. Updating personal information

Please notify us promptly if the personal data we hold about you needs to be updated or corrected, by contacting support@insurs.online.

14. Changes to this Policy

We may periodically make changes to this Policy and publish its new version on our website, and, in the event of material changes, additionally notify you by email or through the website. We recommend periodically reviewing this page.

15. Contact information and complaints

For questions relating to this Policy or the processing of your personal data, please contact support@insurs.online.

If you believe that the processing of your personal data violates applicable law, you have the right to apply:

- in Ukraine - to the Ukrainian Parliament Commissioner for Human Rights;
- in the EU - to the national personal data protection authority of your country;

- and also to a court, for the protection of your rights.

Version dated 1 July 2026