

LEGAL FRAMEWORK FOR ACCESS TO AND USE OF THIS WEBSITE

WEBSITE TERMS OF USE

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PRIVACY POLICY

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DISCLAIMERS, LEGAL NOTICES & DISCLOSURES

WEBSITE TERMS OF USE

- [Please read before navigating this site](#)

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The detailed Website Terms of Use, the Privacy Policy, including adjunct Legal Notices, Disclaimers, Disclosures, are made available as a PDF document, as linked from the cookie consent banner and therefore viewable prior to navigating the website.

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WEBSITE TERMS OF USE (Legal Document)

Every website visitor shall take note of these Website Terms of Use, including the adjunct Legal Notices, Disclaimers, Disclosures, and the Privacy Policy, prior to navigating and using this website.

These Website Terms of Use prescribe acceptable use of this website as quoted in this regularly updated Website Terms of Use PDF document.

Content on this website is posted by the website owner, website operator, and denoted authors, being owners of the respective content as posted.

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By using any communication channels accessible through this website, or any other communication channels which might be available for potentially reaching the owners, operators, or publishing authors of this website, the website visitor, as well as the communicating individual or party pledges, under penalty of perjury, to immediately disclose in its entirety any and all information pertaining to the subject and intent of such communication. By engaging in a piece-meal manner of communication

distributed over multiple messages or channels, without revealing the actual and full intent of such communication from the very beginning, the inquiring party forfeits any recourse or resolution of grievances.

Any website visitor submitting e-mail to an e-mail address quoted on this website undertakes to send such e-mail without activating any function requiring confirmation of receipt, or triggering automatic reply. Regardless of any activation of such function, prior to the sender receiving a reply, the submitted e-mail shall be deemed by the sender as not having been read by the intended recipient, or any other party. Prior to inquiring whether any reply e-mail has been submitted, the sender of the original e-mail shall check the spam folder, or junk folder and the web host's e-mail catchall repository.

PRIVACY POLICY

Prelude & Explanatory Notes on the "Privacy Policy"

Visitors to our website are kindly requested to first consider the following information and explanatory notes before recognizing and evaluating the legal definitions, stipulations, and requirements, outlined further below:

Your connection to us via the internet

Whenever you connect to our website, you will be visiting our server at the following IP address:

[91.232.125.28](#)

with the trusted provider "[The Hosting Heroes Ltd.](#)"

Please note that due to the idiosyncracies of cloud technology implemented in modern data centers, and depending on the location this IP address check is executed from, an IP address check may intermittently display a different IP address, or a different location associated with the stated IP address.

Whenever you connect to our server to visit our website, this connection is made securely by using an encryption protocol known as "SSL" (Secure Sockets Layer). This encryption is designed to make sure no one else has access to the data transferred between your computer and our server, in either direction.

The encryption is recognizable by a "padlock symbol" in your browser's web address field, and by the URL spelled "https://..." (rather than "http"). "HTTPS" means "HyperText Transfer Protocol – Secure".

As a general rule, it is not safe to visit websites without this security feature. Your connection might be hijacked and re-routed to another server, or the website you are accessing might be hacked. Avoid typing in any information in the form fields found on websites that have an insecure connection!

Your browser will likely warn you about an “insecure connection” in advance. In many cases, however, this browser warning and the connection via “http://...” rather than “https://...” arises from a completely innocent mistake made by web developers – for example the integration of a so-called hot-linked image (an image not stored and made available on the server that is hosting the website, but “pulled” on someone else’s server).

Your personal data

We do not intend to harvest, re-use, sell, or otherwise make use of your personal data or other identifying information outside the scope of our website presence in any way.

We work with certain partners and services, who collect and evaluate the publicly viewable information you make available whenever connecting to the internet, as captured by your browser and made readable to the server you are connecting to, when clicking a link or typing in a web address (URL).

This publicly viewable and accessible information is:

1.

Your IP address, i.e. an address identifying your internet provider which is specific to you. Think of your IP address like the license plate on your car: it is not feasible to drive on the road network without one, all the while every other motorist or even bystander can read it.

Your IP address can be obfuscated, by replacement with another IP address “on the fly”, using a so-called VPN service (Virtual Private Network) you may wish to activate.

Some networks (wireless WiFi or wired LAN) provide so-called dynamic IP addresses, which means your actual IP address is changed or rotated on a regular basis.

2.

Your computer’s operating system, and device identifier.

3.

Cookies which have been set in your browser’s cookie depository by the partners and services we use, during the current and any previous visits to our website (and which you have not yet deleted).

Our partners and the services we use do not investigate what other websites you have visited. This would be possible by parsing the cookies set by those other websites in your browser (cookies which you have not yet deleted), and which can provide certain information specific to you – information that would otherwise remain inaccessible, incoherent, or incomplete.

Specifically, our partners and the services we use do not register, evaluate, access, or make use of so-called “**Third Party Cookies**” which you may have allowed to be stored in your browser, and which can

be read by the cookies set by other websites you visit after that. Cookies are text files, and different websites may read information captured and stored in these text files while you visited other websites.

For example, the website Amazon.com may leave a Third Party Cookie in your browser, telling the world you have been looking for women's lingerie on Amazon (the keyword "lingerie" you typed into the Amazon search bar is also written into a Third Party Cookie). You might then access the website of your local newspaper and see ads for lingerie displayed in that website's sidebar. This would be because you agreed to the newspaper website setting "all" cookies, making your information fair game for any third party data scrapers which your local newspaper may cooperate with – who will read the contents of the Third Party Cookie previously set by Amazon. Some of the cookies set by these third parts data scrapers actually read every keyboard stroke while they are active, and as a result seem to always know what is "on your mind".

4.

Your browser, such as e.g. Google Chrome, or Firefox. Modern web browsers provide users with extensive opportunities to protect themselves against being tracked on the internet. These mechanisms need to be studied and understood by the web user, and the web user must adjust the manual settings in their browser for these mechanisms to be effective.

For example, you have the option of deleting all cookies automatically whenever you close your browser or shut off your computer.

Also, you can manually delete all cookies currently present in your browser before accessing a new website. For example, if you just visited the website of a credit rating agency and looked up your information there, you may wish to delete the cookies set by that website before accessing your online banking.

5.

Where you click, and which pages you visit, also, which media you view or which PDF documents you download. Our partners and the services we use do track every URL (website address, link) on our website which you visit or click on.

Our partners and the services we use do access, capture, store, and evaluate this data you provide publicly whenever you connect to the internet and access our website.

We also gain information on the origin of access to our website, for example, from which country, city, or metropolitan area your internet provider is connecting you to our web presence.

This data is only used in an anonymized manner (your name and the physical address associated with your IP address are not publicly viewable and hence are never registered). Only law enforcement agencies would be entitled to research your physical address, based on a registered IP address.

Such use of publicly viewable user data is concurrent with generally established practices among the vast majority of other websites you might be visiting on a daily basis.

The purpose of such use is to allow us to optimize and adapt our web presence in a manner most suitable to meet your needs.

Why is it called a “Privacy Policy”?

Indeed, this term – having come into use over the years – is a bit misleading. In essence, the Privacy Policy explains how much privacy you are surrendering by visiting a website.

Similar rules about how your data can be used, how you can request access to stored data, and how you may ask for this data to be deleted (so-called “right to be forgotten”) are in effect in various jurisdictions.

In Europe, the term “Data Protection Policy” is often used. It arises from the underlying legal framework, known as “GDPR” (General Data Protection Regulation).

GDPR legal initiatives were first fielded by European authorities. US state law was then modeled in a similar fashion, such as now applicable in California, and other states.

For website operators, having a Privacy Policy, or Data Protection Policy in place is not only a legal but also a reputational, and also a business requirement. For example, it is impossible to integrate a payment gateway into an e-commerce website without such a policy being made available.

The purpose of so-called “Data Protection” legislation

When you dig into the issue a bit deeper you may realize that the underlying purpose of many a published privacy policy document, as well as the legislation this is based on, often seems to not actually protect your data. Instead, one gets the distinct impression an attempt is made to legalize harvesting and use of such data in ways most web users cannot possibly fathom or comprehend – by actively soliciting the users’ consent, without enabling them to make an informed decision.

Lawmakers, and their sponsors, have spent endless hours and parliamentary sessions working out the details of “data protection” and “cookie legislation”, so as to retain the appearance of protecting their constituents’ personal data, and so as to be able to claim plausible deniability in case your data is used in ways you may not like, by some service which has read a Third Party Cookie ... that has read another Third Party Cookie, set by another Third Party Cookie in your web browser’s depository.

Different types of “cookies”

The relevant data protection, or “cookie” legislation categorizes cookies according to their function, and purpose. One such category is known as “functional”, “technical”, “necessary”, or “essential cookies”. By law, the placement of these specific cookies (only) does not require the web user’s consent, given that this type of cookie is deemed to be essential for the proper functioning of any given website.

Recent amendments to GDPR legislation have now stipulated that any permission granted by web users for placement of cookies in their browser must proceed on an “Opt-In” (meaning the opted-out

state is default) basis. This means that by law, whenever the user first visits a website, by default no permissions are granted unless the user actively grants such permission afterwards by clicking a button labeled "Agree", or "Confirm", or sliding a switch to "On".

This in contrast to the previously prevalent mode of "Opt Out" (meaning by default you opted in automatically just by accessing the website): all cookies were set as soon as the website loaded, to be deleted or deactivated by the user actively requesting this cancellation in the subsequent cookie consent flow. The wholesale placement of cookies during initial loading of the website in the user's browser window already allowed for harvesting of certain information from any Third Party Cookies present there – even before such activity could be interdicted by the user opting out. Certain legislators wised up to this and proposed amendments to GDPR legislation accordingly.

However, cookies in the category is known as "functional", "technical", "necessary", or "essential", as required for proper functioning of the visited website, do not require any consent from the user under GDPR rules, and are "opted in" automatically as a result. Opting out from essential cookies is not technically possible.

Some implementations of cookie consent now require the user to manually activate cookies depending on the category, or even the individual supplier, of such cookies. This tends to create a rather cumbersome user experience, and we have decided to avoid these elaborate solutions. Their implementation is simply not necessary.

Applicable jurisdiction of a privacy policy document

Please bear in mind that the wording of a privacy policy arises from certain legal requirements applicable to a specific jurisdiction.

Things get complicated when a business is located in one place, their website is on a server in a completely different jurisdiction, and the user is accessing the website from a place (which might not even be the user's home), possibly from another continent.

Given our website presence addresses a global audience, our "Privacy Policy" cannot possibly accommodate the requirements of any and all jurisdictions in equal measure. Contrary to common perception, GDPR is not a "global law". There is no such thing as a globally applicable law, given there is no global jurisdiction.

It is generally accepted that the privacy policy of a website must comply with the local jurisdiction applicable to the registered seat of the website publisher.

But the internet reaches across borders. Being subjected to the local jurisdiction of a given website publisher is of little use to website visitors from all over the world.

We therefore aim to streamline our privacy policy document, so as to enable a sensible level of compliance with basic requirements stipulated by law in multiple jurisdictions.

Additionally, we aim to offer our website visitors the maximum possible level of transparency.

We select our partners and the services we use very carefully.

We categorically refuse to allow third-party services, operating internationally, and spread across various jurisdictional environments, to leverage our website presence for the benefit of their commercialized data-harvesting schemes, as these generally offer no benefit either to our users, or for the management of our website presence.

Types of cookies which may be placed when visiting our website:

1.

“Functional” (a.k.a. “technical”, “essential”, “necessary”) cookies

On this website, we ourselves, within the framework of our own website installation, do not set any cookies in your browser which do not meet the description of being “functional”, “technical”, “necessary”, or “essential cookies”.

The CMS (Content Management System) we use will place certain temporary session cookies in your browser. Additionally, the theme used for presenting our website may place such temporary cookies in your browser.

Functions related to member sign-up & login, or client registration & login will place temporary session cookies in your browser, which store your login user name (e-mail address) and password in an encrypted manner. Please make sure you have noted down or remembered your password before logging out and/or deleting these cookies, as this would cause the saved data to no longer be accessible.

2.

Cookies set by our partners and services we use

The partners and services we use will, only after you have clicked “Opt-In”, place certain cookies in your browser, allowing them to capture anonymized information about your website visit. These cookies do not match the description of “functional”, “technical”, “necessary”, or “essential cookies”.

The placement of these cookies takes place only after you clicked “Opt In”, thereby actively giving permission for such services to load the required scripts as part of the cookie consent flow.

You can even see and read these scripts. Just activate your browser’s “Inspector Mode”, and search for whatever is placed just beneath the <body> html tag.

We use the following partners and services, who will utilize these scripts only following your permission, given by clicking the “Opt-In” button (If you click “Opt-Out”, the scripts will remain in place, but will not be used). These partners and services will then place their own cookies, specifically reserved for use with our website, in your browser:

[Matomo Analytics](#)

[Yandex Metrica Analytics](#)

[Google Analytics \("GA4"\), coupled with Google Search Console \("GSC"\)](#)

Cookies set by websites linked from our website, based on referrals

It is common practice for website operators to link to other websites within the context of a referral to another business. This underlying advertising concept is known as "Affiliate Marketing". As such, we as the website operator are an "affiliate", or "referral partner", of the business you are being referred to when clicking a link embedded on our website that takes you to the website of that business.

The website you are reaching after clicking such an "Affiliate Link" will set a cookie in your browser, identifying you as a customer prospect, and us as the affiliate having made the associated referral.

You will not pay higher prices because you reached that business through such an "Affiliate link", compared to what you would otherwise pay if you had accessed that website through the Google search engine - or by simply typing their website URL into your browser address field. However, current or future special offers may apply to you because you used that specific "Affiliate link" to onboard with the referred business.

Please do not delete any cookies set by our referral partners before you have completed their client onboarding process, as otherwise you may deprive yourself of such potential benefits.

Cookie placement outside of our control

1.

Cookies set by social media platforms

Clicking certain social media links placed on our website will trigger placement of a cookie by that social media platform. Depending on whether you are already logged into that social media platform, other cookies may be set in succession.

This also applies in case you are using Google or Facebook as a "SSO" (Single Sign-On) provider, namely for purposes of authentication with other services, websites, or platforms. We have no control over the cookies set by such social media platforms, neither over their interaction amongst each other, nor with cookies set by our website.

Given you choose to interact with that specific linked social media platform, the privacy policy published by that social media platform applies exclusively, in all cases.

This also applies when you view media embedded on our website, such as videos hosted on the YouTube, or Rumble platforms. The embedding on our website happens in a so-called "iframe", which is a method of building a "window" from one website to a specific section on another website.

It is generally advisable to only log in to any social media platform when you actually intend to use it at that time, and to make sure you are not visiting any other website or using another service at the same time.

For example, when viewing a YouTube video embedded in an iframe on our website, whether you are simultaneously logged into your Google account will affect what Google (the owner of YouTube) can glean from this interaction. This is because you are in fact accessing the YouTube website through the iframe embedded on our website.

As a general rule it is a sensible precaution to log out from one service or website before logging in to any other, and to abstain from using SSO solutions which may log you into multiple services or platforms simultaneously – depriving you of any specific control over the processing of your data as it is being exchanged between these multiple services or platforms.

2.

Cookies set by payment service providers

A payment gateway (for example PayPal or a credit card checkout) connected to our website would store data in cookies inside your browser, in an encrypted manner designed to be otherwise inaccessible.

It is important to understand that when entering the data for payment you are in fact accessing the website of that payment gateway, and have left our website for this specific process.

The payment gateway may be embedded on our website using a technology called "iframe" which might be explained as being a window from one website to another.

Alternatively, the payment gateway may open in a separate page hosted on that payment provider's website presence.

These methods are used for security reasons and to ensure compliance with the PSD2 directives in effect.

Given you choose to interact (make a payment) using that specific payment gateway, the privacy policy published by that payment gateway will apply, exclusively, in all cases.

Your personal data you type in form fields on our website

When visiting our website, you may be entering data into form fields. This data is transferred via an encrypted connection, and designed to be stored in encrypted form.

Your data will be retained in the databases on our servers only for purposes you initially entered that data. For example, you might be providing your e-mail address for purposes of sign-up or registration, and for subsequent logging in to your profile page.

Your data will not be used for any purpose other than why you entered it into a form field on our website at the time. So if you provided a specific e-mail address as a login user name, we will not use that e-mail address for any e-mail communication outside of the scope of the account you registered for. This applies unless you grant us specific permission to do so, for example, by providing "marketing consent" or subscribing to our "newsletter".

We will not share, proliferate, or even sell your data to any third parties. Law enforcement authorities may request handover of your personal data. We will comply with such a request only on the basis of a warrant or court order.

Your data will be deleted upon your request, for example when you decide to close a membership or client account on our website. Even if you never delete your data, we will not use this data for any other purpose as originally provided for.

As a precaution, we may delete dormant user accounts after a certain grace period, which would entail the deletion of any data you may have provided.

1.

Your e-mail address

Your e-mail address will be stored in our systems when you register and log in to your membership or client account on our website.

We use your e-mail address in our systems only to enable and provide the services you request, and may for this purpose send – possibly automated – messages related to your membership or client account on our website.

Please bear in mind that hackers may try to access your membership or client account. Hackers knowing your e-mail address will be the first hurdle they have to take in such an attempt. Therefore, please consider carefully which e-mail address you choose to use as a login name, and for your user profile on our website. It is advisable to use an e-mail address for such purposes which is different from the one you use for general communication.

2.

Your password

The password you set when registering a membership or client account on our website is the most important safeguard against unauthorized access to your account.

Please be aware that passwords are generally stored in encrypted form. Neither we, nor others, can read your password in plain language. We cannot retrieve your password, if lost or forgotten. The only option then is for you to "reset" (replace, renew) your password, via a link sent to the e-mail address you originally provided at the time you set the now lost or forgotten password. If you also lost access to that e-mail account (a situation entirely outside the scope of our website operations) we can only reinstate your membership or client account after validating your personal information by other means (involving courier mail and the supply of certified/notarized copies of government-issued identity documents).

Many web users create user registrations in a hurry, and often use the same password across all registrations they execute. In fact, many users actually use the phrase "password" as a password. Such haphazard practices are highly inadvisable, making life all too easy for hackers.

Advice on choosing a secure password:

A password should never match a letter sequence found in any word that is spelled out in any dictionary. A good policy is to choose a unique password you easily remember by heart. You may wish to delete all vowels, or all consonants (as you choose) from the original spelling of this unique password. Furthermore, you could divide this password into syllables, with one syllable to be all capitals, the other being all lower case. This would satisfy the ubiquitous password setting requirement of having both upper and lower case letters included in your password. Furthermore, you should add or intersperse a number or figure you can remember easily into your password spelling.

Advice on entering your password into form fields:

The most secure password is of no use in protecting your account when it is read by keyboard loggers operating clandestinely on your computer, as you type it into a form field on a website. A keyboard logger is software stored on your computer, sometimes even with your unwitting consent, which logs, stores and/or transmits online any keystroke sequence you type.

Some keyboard loggers only activate when a form field on a website is highlighted (cursor placed inside the password entry field).

Apart from running an effective anti-virus and web security software on your device, one strategy to render many keyboard loggers ineffective is to copy your password from a text file (Notepad .txt) stored on e.g. a USB stick, and paste it into the password field on the website you are accessing. The keyboard logger software operating on your system might then capture the keystrokes [CTRL + C] + [CTRL + V] (mouse commands, right-click "Copy" + "Paste") - but not the exact spelling of your password.

3.

Your telephone number

You may be requested to provide a mobile/cell phone telephone number to receive a SMS text message for purposes of 2FA (Two Factor Authorization) account security.

We will not store or make use of this telephone number for any purpose other than enabling your 2FA-secured login to your membership or client account on our website.

For example, you cannot expect us to make a callback to your mobile/cell phone number for purposes of providing general customer service, if you have not provided that number to us through other channels.

Personal data you submit with any communication sent to us

When you communicate with us, for example by making use of the contact details spelled out on our website, be it by e-mail, phone, or even by post, we will inadvertently be provided with your personal data as a result. This communication takes place externally from our website installation, separate from our server and databases, and is therefore outside the scope of any applicable privacy policy requirements.

When you communicate with us, by telephone, e-mail, or by letter, you provide your personal data to us on your own volition. We will not be responsible for the further use, proliferation, or even misuse of this personal data you provide to us, at that time or in the future. We cannot be expected to keep track of this data, or provide proof of such data being stored in a certain way, or of it having been deleted.

You accept these conditions when engaging in communication with us outside the scope of our website installation and therefore outside the applicability of any privacy policy requirements.

PRIVACY POLICY (legal document)

for website seo-consulting.agency, the “**Site**”

This Privacy Policy document is linked, and retrievable from

https://seo-consulting.agency/WEBSITE_TERMS_OF_USE_PRIVACY_POLICY_DISCLAIMERS

This Privacy Policy is also retrievable via the link “[Website Terms of Use and the Privacy Policy](#)” included in the initial cookie consent flow upon initial (first-time) loading of any website page of the Site, and can therefore be viewed prior to actually accessing the Site.

This Privacy Policy is part of the Website Terms of Use applicable to this website. It is your responsibility as a website visitor to read this document in its most current form before accessing our Site under seo-consulting.agency.

We reserve the right to modify or adapt this Privacy Policy at any time, without prior notice. Your knowledge of this document is a prerequisite to making use of our Site in any way, as spelled out in the Website Terms of Use quoted above.

This Privacy Policy document applies to those users of the Site ("**Visitors**") who visit without transacting business and Visitors who register to transact business on the Site and who make use of the various services offered thereon (collectively, "**Services**"), as offered to ("**Authorized Customers**").

The Site and our Services are not directed at children or minors under the age of 18. If a child or minor under the age of 18 submits personal data to us and we learn that this is the case, we will take steps to remove such personal information from our databases. If you believe that we might have any personal information from a child under 18, please contact us at using the stated communication channels.

"Personally Identifiable Information"

refers to any information that identifies or can be used to identify, contact, or locate the person to whom such information pertains, including, but not limited to, name, address, phone number, fax number, email address, financial profiles, social security number, and credit card information.

Personally Identifiable Information does not include information that is collected anonymously (that is, without identification of the individual user) or demographic information not connected to an identified individual, hereinafter referred to as "**Anonymous Data**".

Anonymous Data collected to identify a specific Visitor without reference or knowledge of name:

We may collect basic user profile information from all of our Visitors, anonymously:

- IP address
- Operating system you use
- Device identifiers, e.g. "Open Device Identification Number"
- Type and version of your browser
- The timing and duration length of your visit
- Location your internet provider connects from
- The pages you visit
- Any links you click
- Any media or content you download

Anonymous Data is used for the following purposes:

Log Files: As is true of most websites, we gather certain information automatically and store it in log files. This information includes IP addresses, browser type, Internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information to maintain and improve the performance of the Site and the Services.

Analytics: We use analytics services such as Google Analytics, Yandex Metrika, and Matomo to help analyze how Visitors use the Site. Analytics services use "**Cookies**" to collect information, such as how often users visit the Site and we use the information to improve our Site and Services. The analytics services' ability to use and share information collected by them is restricted by their terms of use and privacy policy, which you should refer to for more information about how these entities use this information.

Location Information: If you have enabled location services on your mobile device, we may collect your location information to improve the Services we offer. If you do not want this information collected, you can restrict or disable location services on your device.

Cookies: "Cookies" are small pieces of information (text files) that a website sends to your computer's hard drive while you are viewing the website. These text files can be used by websites to make the users experience more efficient. Both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) may be used, to provide you with a more personal and interactive experience of our Services and to market the Services or other products. The law states that we can store these cookies on your device without your express consent if they are strictly "necessary", "functional", "technical", or "essential" for the operation of this Site. For making use of all other types of cookies we need your permission which you grant by opting in to the activation of the relevant scripts making use thereof.

Consenting to our use of cookies in accordance with the terms of this policy when you first visit our website permits us to use cookies every time you visit our website.

Additionally, some cookies are placed by our partners that appear on our pages. These cookies are set after you click a link to their website, subject to the Privacy Policy in effect on that website.

Marketing cookies may be set by third parties, including social media platforms, news services, or payment providers, linked from the Site. These cookies are used to display ads or content relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers. The tracking with these marketing cookies is done on an anonymous basis, but allows the identification of specific Visitors.

Visitors have the option of deleting cookies in their browser at any time. If you decide at any time that you no longer wish to accept cookies from our Services for any of the purposes described herein, then you can instruct your browser, by changing its settings, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. Please consult your browser's technical information. Please bear in mind that if you opt out from accepting cookies, you may not be able to use all portions of the Site or Services, or the entire functionality of the Site or Services.

We may also create Anonymous Data records from your personal information by completely excluding information (such as your name) that makes the data personally identifiable to you. We use this Anonymous Data to analyze request and usage patterns so that we may enhance the content of our Services and improve Site functionality. We reserve the right to use Anonymous Data for any purpose and disclose such Anonymous Data to third parties at our sole discretion.

We may store and process the Anonymous Data on servers located in the United States, Europe, and RoW (Rest of World) locations.

Anonymous Data collected to identify a specific Visitor is used to:

- Perform analysis and improvements on the Site, about our products and services
- Improve our commercial strategy
- Provide and deliver products and services our Visitors request
- Operate, maintain, and improve our Site, other websites, products, and Services
- Develop, improve, and deliver marketing and advertising for the Services
- Keep our website secure and prevent fraud
- Verifying compliance with the Website Terms of Use governing the use of our website (including monitoring private messages sent through our website private messaging service)
- Potentially other uses as yet undefined

Personally Identifiable Information provided by Authorized Customers:

We request the following Personally Identifiable Information from our Authorized Customers, which is provided by manual entry into the form fields on our website. We store and maintain this data only after having received prior consent in acknowledging this Privacy Policy from the Visitor, wanting to become an Authorized Customer:

- E-mail address
- Chosen user name
- Name
- Address
- phone number (as used for "2FA" - Two Factor Authentication)
- Birthdate (on a case-by-case basis)

We may store and process your Personally Identifiable Information on servers located in the United States, Europe, and RoW (Rest of World) locations.

If you provide us with information through the contact form, chat application, by phone, e-mail, or letter, you will identify yourself and provide contact details to be classified as Personally Identifiable Information.

We may use the Personally Identifiable Information you provide for the following purposes:

- Identify you as a user in our system
- Answer your questions, applications or requests
- Respond to comments and questions and provide customer service
- Manage the requested service, respond to and processto your application, or request
- Supply information by electronic means, which relates to your request
- Supply information on commercial offers, sources of knowledge, or events by electronic means, provided that you have given prior authorization

We may receive testimonials and comments from Visitors and Authorized Customers who have had positive experiences with our Services. We may publish such content. When we publish this content, we may identify our users by their first name initials and full last name. The Visitor consents to posting this information along with the testimonial by way of submitting such testimonial and comment.

If you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the license you grant to us.

Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

Other organizations which may obtain your Personally Identifiable Information

In addition to our direct collection of information, our third party service vendors (such as credit card companies, clearinghouses and banks) who may elsewhere provide such services as credit, insurance, and escrow services may collect this information from our Visitors and Authorized Customers. We do not control how these third parties use such information, but they are required by law to disclose how they use Personally Identifiable Information provided to them by Visitors and Authorized Customers. Some of these third parties may be intermediaries that act solely as links in the distribution chain, and do not store, retain, or use the information given to them.

We may disclose your Personally Identifiable Information to any of our employees, officers, insurers, professional advisers, agents, suppliers, or subcontractors as reasonably necessary for the purposes set out in this Privacy Policy.

We may disclose your Personally Identifiable Information to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) as reasonably necessary for the purposes set out in this policy.

We may disclose your Personally Identifiable Information:

1. to the extent that we are required to do so by law;
2. in connection with any ongoing or prospective legal proceedings;
3. in order to establish, exercise, or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
4. to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling; and
5. to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

Except as provided in this policy, we will not provide your Personally Identifiable Information to third parties.

Marketing Consent

In practice, you will usually either expressly agree in advance to our use of your Personally Identifiable Information for marketing purposes. Once this your permission has been received we provide you with an opportunity to opt out of the use of your personal information for marketing purposes at any time. You may instruct us at any time not to process your Personally Identifiable Information for marketing purposes, in adaptation of the initial consent you would have to have given us.

International data transfers

1. Personally Identifiable Information that we collect may be stored, processed in, and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this policy.
2. Information that we collect may be transferred to the following countries which do not have data protection laws equivalent to those in force in the European Economic Area: the United States of America, Russia, Japan, China, and India.
3. Personal information that you publish on our website or submit for publication on our website may be available, via the internet, around the world. We cannot prevent the use or misuse of such information by others.
4. You expressly agree to the transfers of personal information.

Retaining of Personally Identifiable Information

1. This section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations regarding the retention and deletion of Personally Identifiable Information.
2. Personally Identifiable Information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
3. Without prejudice to the above item, we will usually delete Personally Identifiable Information within 5 years after the last communication with you or your last visit to our Site
4. Notwithstanding the other provisions of this section, we will retain documents (including electronic documents) containing Personally Identifiable Information:
 - a. to the extent that we are required to do so by law,
 - b. if we believe that the documents may be relevant to any ongoing or prospective legal proceedings, and
 - c. in order to establish, exercise, or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

Security of your personal information

1. We will take reasonable technical and organizational precautions to prevent the loss, misuse, or alteration of your personal information.
2. We will store all the personal information you provide on our secure (password- and firewall-protected) servers.
3. All electronic financial transactions entered into through our website will be protected by encryption technology.
4. You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.
5. You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password (except when you log in to our website).

Your rights as a Visitor or Authorized Customer

You may instruct us to provide you with any Personally Identifiable Information we hold about you; provision of such information will be subject to the following:

1. the payment of a fee, to be charged on a cost-only basis, as billed to us by the partners and services assisting in this process
2. the supply of appropriate evidence of your identity (2 government-issued IDs + PoR document, such as utility bill, notarized and apostilled as required)

E-Mail communication

By sending an e-mail to a contact address provided, or from a contact form embedded on this website, the sender of such e-mail consents to the storage and forwarding of the sender's data and communication content, also for receipt and dissemination by unaffiliated third parties. Both the owners and operators of this website, as well as the recipients of any communication, do not assume responsibility for any incidental or consequential damages as they may arise from the divulging of personal information contained in the sender's e-mail to any third parties.

At the discretion of this website's owners and operators, due diligence and care is exercised in keeping any received communication, and included personal data, confidential. As a matter of principle, confidential information should never be sent by e-mail, and is expressly not requested to be received at an e-mail address posted on this website, or a contact form embedded therein.

The e-mail address obtained from the sender of any e-mail will not be sold for use by advertising agencies or for similar purposes. Any communication the sender may receive in reply to any e-mails submitted shall as its main purpose address the subject matter initially raised by the sender, and shall otherwise be occasional in nature. The sender may choose to opt out from receiving any further communication at any time, by operating relevant blocking controls within the e-mail client used.

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By clicking on text links, labels, images, PDF files, videos, overlays, popups, popunders, dropdowns, page peels, buttons, or any other web link functionality, the user may be referred to an external website operated by a separate commercial or private entity. This external website may be displayed within an iframe inside a pop-up / modal designed to facilitate seamless navigation. Such external websites embedded into an iframe are technologically identical to those opened in separate browser tabs, and the user undertakes being subjected to the applicable terms & conditions and privacy policy issued by such external websites when navigating into and within an iframe.

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- Successfully disprove the applicability of "fair use" provisions.
- Provide a complaint in written form, as prescribed by pertinent legislation.
- Include a physical or electronic signature of the complainant.
- Identify the specific copyrighted work claimed to be infringed, or, if multiple copyrighted works are covered by a single complaint, provide a representative list of such works.
- Provide the URLs for the specific files on this website allegedly infringing the copyright.
- Include a written affidavit of the complainant's good faith belief that use of the disputed material is not authorized by the copyright owner, its agent, or the law.
- Include a written statement that the information in the notification is accurate, and under penalty of perjury, that the complainant is authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.
- Supply any or all of the above at their own expense.

Use of copyrighted content

The use of any creative work, such as images, photographs, charts, drawings, sketches, slogans, originally conceived and authored text, text passages, quotations, names of significance, screenshots, labels, trademarks, logos, PDF files, video footage, or any other type of creative work, regardless of copyright attribution, as found on, viewable, and retrievable from this website, by any website visitor, including parties affiliated with, or contracting with said website visitor, requires expressed permission from the author, creator, and copyright holder of said creative work.

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The content containing referral links may include content displayed in banner ads, leaderboard and skyscraper ads, text links, images, PDF files, videos, overlays, popups, popunders, dropdowns, page peels, and other website modules designed or routinely used to display advertising content.

The website visitor will not pay higher prices when clicking a "Affiliate Marketing" referral link, as compared to accessing the same offer by another route. In some cases, following the "Affiliate Marketing" referral link provides access to specific offers or reduced prices only available by using such referral link, and not generally accessible by alternate means.

Pertinent jurisdictional disclosure requirements are hereby deemed to be satisfied. Additionally, on a case-by-case basis, affiliate marketing notices required by the FTC (specific to US jurisdiction) may be displayed in the vicinity of such links or advertisements, including in tooltip (title attribute) text, in footnotes, or small print. The absence of such notices on links and advertisements, possibly due to layout or user experience considerations, and possibly dependent on the user's display size, does not infer the placement of such links or advertisements independent of a commercially motivated referral activity.
