

# Privacy Policy

*for the Elspal service*

Service	Elspal
Website	elspal.com
Contact email	info@elspal.com
Edition	Basic edition for website publication

This Privacy Policy describes what data the Elspal service collects and processes, for what purposes it is used, how it is protected, and in what cases it may be shared with third parties. This document applies to all users of the website elspal.com, including visitors, registered users, listing authors, and customers of paid services.

By using the Elspal website, the user confirms that they have read this Policy and accept its terms.

## 1. Operator and contact details

The Elspal service is operated by a private individual, founder Serghei Plohotniuc.

The contact address for inquiries related to the processing of personal data is: info@elspal.com.

## 2. What data we may collect

- **data that the user provides directly: name, email, phone number, messenger links, profile information, author or agent details**
- **data related to real estate properties: address, district, city, description, photographs, price, characteristics, amenities, contacts, and other information uploaded by the user**
- **data transmitted automatically: IP address, cookies, technical parameters of the device and browser, interface language, information about visits and actions on the website**
- **data about interaction with the service: favorites, recently viewed properties, navigation between sections, inquiries through forms, and home search requests**
- **service data required for magic link authorization, account security, and prevention of abuse**

## 3. Purposes of data processing

- **providing access to website functions and the personal account**
- **creating and maintaining the user account**
- **publishing and displaying real estate listings**

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- **communicating with the user regarding the service, requests, and support**
- **providing the paid full-service home search offering**
- **improving website quality, usage analytics, and product development**
- **ensuring security, preventing fraud, and enforcing the rules**
- **complying with applicable legal requirements**

### 4. Legal grounds for processing

Data is processed based on the user's consent, the necessity to perform the Terms of Use, provide requested services, as well as the legitimate interest of the service in operating the website, analytics, security, and protection against abuse.

### 5. Cookies and analytics

The website may use cookies, browser local storage, and similar technologies for authorization, saving user preferences, operating favorites and recently viewed properties, as well as for analytics and interface improvement.

The website may use third-party analytics and infrastructure services, including Postmark, Google Analytics, Yandex Metrika, Google Maps, and hosting services. These services may process technical data within the scope of their functionality and their own privacy policies.

### 6. Sharing data with third parties

Elspal does not sell users' personal data. Data may be shared with third parties only where necessary:

- **for website operation, email delivery, analytics, maps, and hosting**
- **to fulfill the user's request or provide an ordered service**
- **to protect the rights and legitimate interests of Elspal, users, or third parties**
- **when required by law, court, government authority, or in other cases provided by applicable law**

### 7. Data retention period

Data is stored no longer than necessary for the purposes of processing, account operation, fulfillment of obligations, handling inquiries, providing services, compliance with legal requirements, and dispute resolution. Some technical and analytical data may be stored longer in anonymized or aggregated form.

### 8. User rights

- **request information about their data processed by the service**
- **ask to clarify, update, or correct data**
- **withdraw consent to processing where processing is based on consent**
- **request deletion of data if retention is no longer required or not based on law**

- contact [info@elspal.com](mailto:info@elspal.com) with questions about data processing

### **9. Security**

Elspal takes reasonable organizational and technical measures to protect data against loss, unlawful access, alteration, disclosure, and other misuse. At the same time, the user understands that no method of data transmission over the internet can guarantee absolute security.

### **10. Age restrictions**

The service is intended for adult users. Posting properties, ordering paid services, and using functions related to entering into transactions are allowed only for persons over 18 years old.

### **11. International nature of the service**

The service is intended, among others, for users from Vietnam and Russia. Due to the use of international infrastructure services, processing of certain technical data may take place in different jurisdictions to the extent necessary for website operation.

### **12. Changes to the Policy**

Elspal may update this Privacy Policy. The current version is published on the website. Continued use of the website after publication of a new version means the user's acceptance of the updated terms.

### **13. Important notice**

This document is a basic user-facing version for publication on the website and does not replace individual legal review taking into account the country of registration, tax status, applicable law, and the actual business processes of the service.