



Cross-Border Personal Data Transfer Policy

1. General Provisions

This Cross-Border Personal Data Transfer Policy (the “Policy”) governs the procedure for transferring personal data of users of the website **www.kommogen.com** (the “Website”) to countries outside the country of the user’s residence.

The personal data operator is:

TRAPEZNIKOV MIKHAIL

acting under the **KommoGEN** brand as an official partner of **KOMMO (QSOFT LLC)**

Email: gen@kommogen.com

Website: www.kommogen.com

Location: Nha Trang, Khanh Hoa, Vietnam, 65000

By using the Website, the User agrees to the cross-border transfer of personal data in accordance with this Policy.

2. Purposes and Legal Grounds for Cross-Border Transfer

Cross-border transfer of personal data is carried out for the following purposes:

- ensuring the proper operation of the Website;
- processing user requests and inquiries;
- providing consulting, integration, support, and licensing-related services for KOMMO;
- analytics, statistics, and service optimization;
- communication with users, including informational and service-related messages.



Personal data may be processed using technical infrastructure and services provided by third-party companies located outside the User's country, including but not limited to:

- cloud platforms;
- analytics services;
- email and communication services;
- CRM and support tools.

Personal data is transferred only with the User's consent and in compliance with applicable data protection laws.

3. Countries and Data Recipients

Personal data may be transferred to countries that provide an adequate level of personal data protection or where appropriate safeguards are in place.

If personal data is transferred to countries that do not provide an equivalent level of protection, reasonable organizational and technical measures are applied to ensure data security, including contractual safeguards with service providers.

4. Rights of the Data Subject

The User has the right to:

- receive information about the cross-border transfer of their personal data;
- request clarification regarding data recipients and purposes;
- withdraw consent to the cross-border transfer of personal data at any time.

Withdrawal of consent may be made by sending a request to:

gen@kommogen.com

Please note that withdrawal of consent may limit the ability to provide certain services.



5. Data Security Measures

The Operator applies reasonable technical and organizational measures to protect personal data from unauthorized access, loss, alteration, or disclosure during cross-border transfer and processing.

6. Final Provisions

This Policy is published on the Website at: **www.kommogen.com**.

The Operator reserves the right to amend this Policy at any time.

The updated version becomes effective upon publication on the Website.

7. Contact Information

Email: gen@kommogen.com

Website: www.kommogen.com

Location: Nha Trang, Khanh Hoa, Vietnam, 65000