

# Privacy Policy

Last Updated: November 8, 2025

## 1. Introduction

Oleksandr Potapenko ("we," "us," or "our") operates the website [oleksandrpotapenko.com](https://oleksandrpotapenko.com) (the "Website"). This Privacy Policy explains how we collect, use, disclose, and protect your personal data when you visit our Website.

We are committed to protecting your privacy and complying with applicable data protection laws, including the Swiss Federal Act on Data Protection (FADP) and the European Union's General Data Protection Regulation (GDPR).

## 2. Data Controller

### **Oleksandr Potapenko**

Location: Zürich, Switzerland

Contact: [oleksandr@potapenko.email](mailto:oleksandr@potapenko.email)

## 3. Personal Data We Collect

### 3.1 Information You Provide Directly

When you interact with our Website, we may collect:

- **Contact Information:** Name, email address, phone number, company name
- **Professional Information:** Job title, industry, business inquiries
- **Communication Data:** Messages, inquiries, and correspondence sent through contact forms or email
- **Account Information:** If you create an account, username and authentication credentials

### 3.2 Information Collected Automatically

When you visit our Website, we automatically collect:

- **Technical Data:** IP address, browser type and version, operating system, device information
- **Usage Data:** Pages visited, time spent on pages, navigation paths, referral sources
- **Cookies and Tracking Technologies:** See our Cookie Policy for detailed information

### 3.3 Information from Third Parties

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We may receive information about you from:

- Professional networking platforms (e.g., LinkedIn) if you connect with us
- Business partners and referral sources
- Publicly available sources

## 4. Legal Basis for Processing (GDPR)

We process your personal data based on the following legal grounds:

- **Consent:** Where you have given explicit consent for specific processing activities
- **Contractual Necessity:** To fulfill obligations in agreements with you
- **Legitimate Interests:** For business operations, security, and improving our services
- **Legal Obligations:** To comply with applicable laws and regulations

## 5. How We Use Your Personal Data

We use your personal data for the following purposes:

### 5.1 Service Provision

- Responding to your inquiries and providing requested information
- Delivering professional consulting services
- Maintaining and managing business relationships

### 5.2 Business Operations

- Improving and optimizing our Website
- Conducting analytics and research
- Developing new services and offerings

### 5.3 Communications

- Sending informational updates about our services
- Sharing insights on financial technology and regulatory developments
- Marketing communications (with your consent where required)

### 5.4 Legal and Security

- Complying with legal obligations and regulatory requirements
- Protecting against fraud, security threats, and illegal activities
- Enforcing our terms and policies
- Defending legal claims

## **6. Data Sharing and Disclosure**

We may share your personal data with:

### **6.1 Service Providers**

Third-party vendors who provide:

- Website hosting and technical infrastructure
- Analytics services
- Email and communication platforms
- Customer relationship management systems

All service providers are contractually bound to protect your data and use it only for specified purposes.

### **6.2 Business Entities**

- FinRay Technologies Ltd (Cyprus)
- Audax Solutions AG (Switzerland)
- Other affiliated entities where relevant to service provision

### **6.3 Legal Requirements**

We may disclose personal data when required by:

- Legal processes, court orders, or governmental requests
- Enforcement of our rights and protection of our property
- Investigation of fraud or security issues
- Swiss or EU regulatory authorities

### **6.4 Business Transfers**

In the event of a merger, acquisition, or sale of assets, your personal data may be transferred to the successor entity.

## **7. International Data Transfers**

Your personal data may be transferred to and processed in countries outside Switzerland and the European Economic Area (EEA). When we transfer data internationally, we ensure appropriate safeguards are in place, such as:

- Standard Contractual Clauses approved by the European Commission
- Adequacy decisions recognizing equivalent data protection standards
- Binding Corporate Rules or other approved mechanisms

## 8. Data Retention

We retain personal data only as long as necessary for the purposes outlined in this Privacy Policy or as required by law.

### Retention Periods:

- **Contact Inquiries:** 3 years from last contact
- **Business Relationships:** Duration of relationship plus 7 years for legal compliance
- **Marketing Communications:** Until consent is withdrawn or 3 years of inactivity
- **Technical Logs:** 12 months

After retention periods expire, we securely delete or anonymize personal data.

## 9. Your Data Protection Rights

Under Swiss FADP and GDPR, you have the following rights:

### 9.1 Right of Access

Request confirmation of whether we process your personal data and obtain a copy of such data.

### 9.2 Right to Rectification

Request correction of inaccurate or incomplete personal data.

### 9.3 Right to Erasure ("Right to be Forgotten")

Request deletion of your personal data under certain circumstances.

### 9.4 Right to Restriction of Processing

Request limitation of processing activities under specific conditions.

### 9.5 Right to Data Portability

Receive your personal data in a structured, commonly used format and transmit it to another controller.

### 9.6 Right to Object

Object to processing based on legitimate interests or for direct marketing purposes.

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### **9.7 Right to Withdraw Consent**

Withdraw consent at any time where processing is based on consent (without affecting prior lawful processing).

### **9.8 Right to Lodge a Complaint**

File a complaint with a supervisory authority:

- **Switzerland:** Federal Data Protection and Information Commissioner (FDPIC)
- **EU/EEA:** Your local data protection authority

### **9.9 Automated Decision-Making**

You have the right not to be subject to decisions based solely on automated processing, including profiling, that produce legal effects or similarly significantly affect you.

## **10. Exercising Your Rights**

To exercise any of these rights, please contact us at [contact email to be inserted].

We will respond to your request within:

- **30 days** under Swiss FADP
- **1 month** under GDPR (extendable by 2 additional months for complex requests)

## **11. Data Security**

We implement appropriate technical and organizational measures to protect personal data, including:

- Encryption of data in transit (SSL/TLS) and at rest
- Access controls and authentication mechanisms
- Regular security assessments and updates
- Employee training on data protection
- Incident response and breach notification procedures

Despite our security measures, no system is completely secure. We cannot guarantee absolute security of data transmitted over the internet.

## **12. Children's Privacy**

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Our Website is not directed to individuals under 18 years of age. We do not knowingly collect personal data from children. If we become aware of such collection, we will promptly delete the information.

### **13. Cookies and Tracking Technologies**

We use cookies and similar technologies. For detailed information, please see our Cookie Policy.

### **14. Third-Party Links**

Our Website may contain links to third-party websites. We are not responsible for the privacy practices of these external sites. We encourage you to review their privacy policies.

### **15. Changes to This Privacy Policy**

We may update this Privacy Policy to reflect changes in our practices or applicable laws. We will notify you of material changes by:

- Posting the updated policy on our Website with a new "Last Updated" date
- Sending email notifications for significant changes (where we have your email address)

Continued use of our Website after changes constitutes acceptance of the updated policy.

### **16. Contact Information**

For questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact:

**Oleksandr Potapenko**

Email: [oleksandr@potapenko.email](mailto:oleksandr@potapenko.email)

Address: Zürich, Switzerland

### **17. Supervisory Authorities**

**Switzerland:**

Federal Data Protection and Information Commissioner (FDPIC)

<https://www.edoeb.admin.ch/en>

**European Union:**

Find your local data protection authority at:

[https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)

## Definitions

**Personal Data:** Any information relating to an identified or identifiable natural person.

**Processing:** Any operation performed on personal data, including collection, storage, use, disclosure, and deletion.

**Data Controller:** The entity that determines the purposes and means of processing personal data.

**Data Processor:** An entity that processes personal data on behalf of the data controller.

**FADP:** Swiss Federal Act on Data Protection.

**GDPR:** European Union General Data Protection Regulation.

**EEA:** European Economic Area.