

# Privacy And Cookies Policies

This website is owned by Hadassah Transfer LLC, registered in the State of Illinois, USA, under number 05672392, and whose registered agent is INCORP SERVICES. INC., 901 S 2ND ST STE 201 SPRINGFIELD IL 62704-7909.

This 'Privacy Policy' describes our policies and procedures on the collection, use and disclosure of 'Your information' when 'You' use the 'Service' and informs 'You' about 'Your privacy rights' and how the law protects 'You'.

We use Your Personal data to provide and improve the Service. By using the Service, You agree to the collection and use of information in accordance with this Privacy Policy. This Privacy Policy has been created with the Congolese Law n° 20/017 of 25 November 2020 on Telecommunications and ICT, as well as , where applicable, DIFC Data Protection Law No. 5 of 2020 (DIFC DP Law 2020) and the General Data Protection Regulation (GDPR)

## Interpretation and definitions

### *Interpretation*

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of **whether** they appear in singular or in plural.

### *Definitions*

For the purposes of this Privacy Policy:

- "Account" means a unique account created for You to access our Service or parts of our Service.
- "Company" (referred to as either "the Company", "We", "Us" or "Our" in this Privacy Policy) refers to Hadassah Transfer LLC, registered in the State of Illinois, USA, under number 05672392, and whose registered agent is INCORP SERVICES. INC., 901 S 2ND ST STE 201 SPRINGFIELD IL 62704-7909.
- "Cookies" are small files that are placed on your computer, mobile device or any other device by a website, containing the details of your browsing history on that website among its many uses.
- "Device" means any device that can access the Service such as a computer, a cellphone or a digital tablet.
- "Law of 25 November 2020" refers to the Congolese Law n° 20/017 of 25 November 2020 on Telecommunications and ICT
- "Personal Data" is any information that relates to an identified or identifiable individual, as defined under DIFC DP Law 2020.
- "Service" refers to the Website.
- "Service Provider" means any natural or legal person who processes the data on behalf of the Company.

- “It” refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.
- “Website” refers to Hadassah Transfer LLC’s website, accessible from <https://usdrc.info/>
- “You” means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

## Legal basis for processing personal data

In accordance with the Congolese Law No. 20/017 of 25 November 2020 on Telecommunications and ICT, , we process personal data based on the following legal bases:

- Consent – When You explicitly provide consent (e.g., subscribing to marketing emails, accepting cookies), as required by Article 132
- Contractual Necessity – When processing is required to perform a contract with You (e.g., account creation, order fulfillment).
- Legal Obligation – When processing is required to comply with obligations imposed by public authorities or regulatory laws in the DRC.
- Legitimate Interest – When processing is necessary for our business operations and does not override Your rights (e.g., website analytics, fraud prevention).
- Public Interest or Official Authority – Where required by competent national authorities or justified for national interest. .

## Collecting and using your personal data

### *Types of data collected*

We collect the following categories of Personal Data:

- Contact information (e.g., full name, email address, phone number, mailing address)
- Usage data (e.g., IP address, browser type, page visits, time spent on pages, device identifiers)
- Technical data (e.g., operating system, network information, login credentials, device location if enabled)
- Marketing preferences (e.g., opt-in consent for newsletters, past interactions with our marketing materials)

### *Data sharing*

We may share your personal data with:

- Service Providers (e.g., cloud storage, analytics, payment processing).
- Hadassah Transfer LLC’s Affiliates, strictly for operational, regulatory, security and service enhancement purposes, ensuring compliance with this Privacy Policy.

- Regulatory Authorities of the DRC, when required by law.
- Third parties, only with Your prior consent .

### *Tracking Technologies and Cookies*

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Service.

#### *Cookies or Browser Cookies:*

A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service. Unless you have adjusted Your browser setting so that it will refuse Cookies, our Service may use Cookies.

#### *Flash Cookies:*

Certain features of our Service may use local stored objects (or Flash Cookies) to collect and store information about Your preferences or Your activity on our Service. Flash Cookies are not managed by the same browser settings as those used for Browser Cookies. Certain sections of our Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be “Persistent” or “Session” Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser.

We use both Session and Persistent Cookies for the purposes set out below:

#### *Necessary / Essential Cookies*

Type: Session Cookies

Administered by: Us

Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

#### *Cookies Policy / Notice Acceptance Cookies*

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

### *Functionality Cookies*

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

### *Performance and Analytics Cookies*

These collect information about how visitors use our website, which pages are visited most frequently, and if error messages are received from web pages. These cookies help us improve our website.

### *Advertising and Targeting Cookies*

Used to deliver advertisements more relevant to you and your interests. They are also used to limit the number of times you see an advertisement and help measure the effectiveness of the advertising campaign.

## Use of Your Personal Data

### *International Transfers of Personal Data*

To provide you with seamless and efficient services, transfers of personal data outside of the Democratic Republic of Congo may occur only in compliance with applicable laws. Where such transfers are necessary, We ensure adequate safeguards to protect Your data and maintain confidentiality. By using our services, you acknowledge that such transfers may occur under these protective frameworks.

### *Retention of Your Personal Data*

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy and in accordance with applicable legal obligations. In compliance with Article 142 of the Law on Telecommunications and ICT in the Democratic Republic of Congo, connection and traffic data shall be retained for a period of twelve (12) months.

We will retain and use Your Personal Data as necessary to comply with legal requirements, resolve disputes, and enforce our legal agreements and policies. Usage Data may be retained for internal analysis purposes, unless a longer retention period is required for legal or regulatory reasons, or to enhance the security and performance of Our Service

### *Security of Your Personal Data*

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

## Children's Privacy

Our Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We take steps to remove that information from Our servers.

If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.

## Links to Other Websites

Our Service may contain links to other websites that are not operated by Us. If You click on a third-party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

## Changes to this Privacy Policy

We may update Our Privacy Policy from time to time. Any changes will be posted on this page with an updated "Last Updated" date. If the changes materially affect how we process Your Personal Data, we will take appropriate measures to inform You, in accordance with applicable legal requirements.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact us

If you have any questions about this Privacy Policy, You can contact us by email: [ceo@usrdc.info](mailto:ceo@usrdc.info)