



GDPR Compliance Statement

Last Updated: January 26, 2026

At CLIK.BY (operated by LLC "Proactive Technology"), we take data privacy and security seriously. We are committed to complying with the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) to ensure the protection of personal data of our customers and their end-users.

This page outlines our approach to GDPR compliance and helps our customers (Data Controllers) understand how we handle data as a Data Processor.

1. Our Role: Processor vs. Controller

Under the GDPR, there is a clear distinction between two main roles. It is important to understand which role CLIK.BY plays in relation to your data.

You (The Customer) are the Data Controller.

You determine the purposes and means of processing personal data (e.g., you decide where to route traffic, which pixels to fire, and what audiences to target). You are responsible for obtaining necessary consents from End Users.

We (CLIK.BY) are the Data Processor.

We process data (such as IP addresses, User-Agents, and Click IDs) solely on your behalf and according to your instructions (as defined in our Terms of Service) to provide the traffic management service.

2. How We Comply with GDPR

We have implemented a comprehensive privacy program that includes:

Data Processing Addendum (DPA): Our Terms of Service include a built-in Data Processing Addendum (Section 5) that legally binds us to protect data in accordance with GDPR Article 28.

Data Minimization: We only collect data that is strictly necessary for the technical functioning of the service (routing, fraud detection, and analytics).

Security Measures: We use industry-standard encryption (TLS/SSL) for data in transit and robust access controls for data at rest.

Confidentiality: All our employees are subject to strict confidentiality agreements.

Automated Decision-Making and AI

Our Service uses artificial intelligence algorithms ("AI Selena") to analyze traffic quality and detect fraud. Under GDPR, this constitutes "profiling."

We guarantee that:

Our AI analysis is based on technical parameters (IP, User-Agent, behavior) and does not use sensitive personal data (race, religion, health).

The final decision on how to handle the traffic (e.g., block it or redirect it) is based on the rules configured by You (the Controller). We provide the intelligence; you make the decision.

3. International Data Transfers

CLIK.BY is located in the Republic of Belarus (a non-EEA country). To ensure lawful data transfers from the EU/EEA to our servers, we rely on:

Standard Contractual Clauses (SCCs): By accepting our Terms of Service, you enter into an agreement that incorporates the European Commission's Standard Contractual Clauses for the transfer of personal data to third countries.

Technical Safeguards: We employ encryption and pseudonymization to ensure that data remains protected during international transfers.

4. Your Rights (and Your Users' Rights)

We provide tools to help you fulfill Data Subject requests:

Right to Access & Portability: You can export traffic statistics and logs via our API or Dashboard.

Right to Erasure ("Right to be Forgotten"): Upon termination of your account, you can request the permanent deletion of your data. We also support automatic data retention policies (data is deleted after a set period).

Right to Rectification: You can update your account information at any time.

If you receive a GDPR request from one of your End Users (e.g., to delete their IP log), please contact us at info@clik.by, and we will assist you in fulfilling this request.

5. Sub-processors

To provide our Service, we may use trusted third-party service providers. We ensure that all sub-processors are GDPR-compliant.

Sub-processor	Purpose	Location
AWS / Hetzner	Cloud Hosting & Infrastructure	Germany / USA
Google Analytics	Site Analytics	USA
Stripe / Webpay	Payment Processing	Global / Belarus
SendGrid	Email Notifications	USA

6. Cookie Compliance

Since you act as the Controller for your traffic:

CLIK.BY does not place consent banners on your tracking links automatically.

You are responsible for implementing a Consent Management Platform (CMP) or obtaining consent from your End Users before firing tracking pixels or setting non-essential cookies via our Service.

7. Categories of Data We Process

As a Processor, CLIK.BY processes the following categories of data on your behalf:

Technical Identifiers: IP addresses, User-Agent strings, Device IDs, Browser language and resolution.

Traffic Data: Referrer URLs, timestamps of clicks, Geo-location data (derived from IP).

Tracking Data: Cookies, unique click identifiers (UUIDs), conversion events.

Note: We do not knowingly collect direct PII (Personally Identifiable Information) such as names, emails, or phone numbers of your End Users, unless you explicitly pass them to us via URL parameters (which we strongly discourage).

8. Data Breach Notification

In the unlikely event of a personal data breach (e.g., unauthorized access to our logs), CLIK.BY will:

Notify you (the Controller) without undue delay (and in any event within 48 hours of becoming aware of the breach).

Provide sufficient information to allow you to meet any obligations to report the breach to the relevant Data Protection Authorities.

Take immediate steps to mitigate the effects of the breach and prevent recurrence.

9. Contact Us

We have appointed a dedicated team responsible for data protection issues. If you have any questions regarding our GDPR compliance, please contact us:

LLC "Proactive Technology"

Email: info@clik.by (Subject: GDPR Inquiry)

Address: Olesheva str., 9, pom. 5, Minsk, Republic of Belarus.