This Policy defines the personal data processing policy of Mkrtchian Gegam Kamoevich (hereinafter referred to as the "Operator") and contains information on the requirements for personal data protection implemented by the Operator. This Policy applies to all personal data processed by the Application, which the Operator receives or may receive from the User.

1. GENERAL PROVISIONS

1.1. The Operator has determined that the following terms and definitions shall have the following meaning for the purposes of this Policy:

«**Personal data**» – any information relating directly or indirectly to an identified or identifiable natural person ("personal data subject"); an identifiable natural person is a person who can be identified directly or indirectly, in particular by reference to an identifier, such as name, surname, patronymic (if any), identification number, individual tax number, SNILS, bank details, year, month, date and place of birth, address, e-mail address, phone number, marital, social, property status, education, profession, income, metadata, that are transmitted to the Operator during the use of the Application by means of the software installed on the User's Device (including location data, HTTP headers, IP address, cookie data, information about the User's browser, technical characteristics of hardware and software used by the User, date and time of access to the Application, addresses of requested Application pages, and other similar information), one or more physical, physiological, genetic, spiritual, economic, cultural factors specific to that person, or referring to social identity factors. In addition, personal data for the purposes of this Policy shall also include information about the User, the processing of which is stipulated by the Agreement governing the use of the Application. Personal data refers to information of a confidential nature. The Operator collects only such personal data that is necessary for the execution of the Agreement.

«**Law № 152-FZ**» – Federal Law of 27.07.2006 N 152-FZ "On Personal Data". Applies to the Operator's activities only if it processes personal data of residents of the Russian Federation.

«**GDPR**» – Regulation of the European Parliament and of the Council (EC) of 27.04.2016 No. 2016/679 "On the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repeal of Directive 95/46 / EC (General Data Protection Regulation)". Applies to the Operator's activities only if it processes personal data of residents of countries that are members of the European Union.

«**CCPA**» – California Consumer Privacy Act. Applies to the Operator's activities only if it processes personal data of California, USA residents, and its annual income exceeds $25,000,000, or receives 50% or more of its annual income from processing personal data, or processes personal data of over 50,000 people who are residents of California, USA.

«**Operator**» – Mkrtchian Gegam Kamoevich, owner and right holder of the exclusive rights to the Application, processing personal data, as well as determining the purposes of personal data processing, the scope of personal data to be processed, the actions (operations) undertaken with personal data. The Operator is the Controller within the meaning of the GDPR and the Enterprise within the meaning of the CCPA.

«**User**» – any legally capable individual (personal data subject), including acting for and on behalf of a legal entity or other individual, able to provide his/her personal data to the Operator while using the Application, on his/her own or through the represented legal entity, who expresses his/her consent to the conditions set forth in the Agreement by signing it, including electronically. In the context of this Policy the User also means the persons whose personal data are processed by the Operator on behalf of the User, as specified in the Agreement. For minors under the age of 13 (under the CCPA and the Children's Online Privacy Protection Act (COPPA)), 16 (under Russian law or GDPR), or another age if required by the User's country of residence (under local laws of European Union member states), the Operator processes personal data only with the prior consent of the minor's parents. If the User is a resident of a country within the European Union, the provisions of this Policy shall apply to the User, subject to the GDPR rules. If the User is a resident of the State of California, USA, the provisions of this Policy shall apply to him/her, subject to the CCPA rules.

«**Application**» – a mobile application called "Eppic" designed to process and edit Users' User Content, which the Company makes available to Users through the online mobile application distribution stores Google Play and Apple AppStore, as well as on the Company's website. The Application is a complex copyright item, the development of which is arranged by the Administration. The Application includes databases, software codes, know-how, algorithms, design elements, fonts, logos, as well as text, graphics and other materials, information, texts, graphic elements, images, photos, audio and video materials and other results of intellectual activity. Exclusive rights to the Application and any of its components belong to the Administration as the copyright holder or licensee by law, contract or other transaction.

«**Website**» – a separate term referring to any of the Operator's websites or all of the websites together. It is used when referring only to websites. In other cases, it is actually included in the term Application.

«**Agreement**» – a User Agreement, the terms of which are in effect between the User and the Operator, regulating the procedure of using the Application and containing the User's consent and/or instruction to the Operator to process his/her personal data.

«Personal data processing» – actions (operations) with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction.

«Processor» – means a natural or legal person, public authority, agency, or other authority that processes personal data for and on behalf of the Operator.

«Recipient» – means a natural or legal person, public authority, agency or other authority to whom the personal data are disclosed, whether or not they are third parties. However, public authorities that may receive personal data as part of a specific investigation under European Union law or Member State law are not considered recipients; the processing of such data by such public authorities must comply with applicable data protection regulations, depending on the purpose of the processing.

«Third party» – means a natural or legal person, public authority, agency or other authority other than the data subject, controller, processor, as well as persons authorized to process personal data under the direct supervision of the Operator or the Processor.

«Automated personal data processing» – processing of personal data by means of computer technology.

«Unautomated personal data processing», «Personal data processing without use of automation tools» – personal data processing, contained in the personal data information system or extracted from such system in cases where such actions with personal data as use, clarification, distribution, destruction of personal data in respect of each of the personal data subjects are performed with the direct participation of the person.

«Personal data distribution» – actions aimed at disclosure of personal data to an indefinite number of persons.

«Personal data provision» – actions aimed at transferring personal data to a certain person or a certain circle of persons.

«Personal data blocking» – temporary termination of personal data processing (except when processing is necessary to clarify personal data).

«Personal data destruction» – actions, as a result of which it is impossible to restore the content of personal data in the personal data information system and (or) as a result of which tangible personal data carriers are destroyed.

«Personal data de-personalization» – actions that make it impossible to determine, without using additional information, whether the personal data belongs to a specific subject. It is a "pseudonymization" within the meaning of the GDPR.

«Personal data use» – actions (operations) with personal data carried out in order to make decisions, transactions or other actions that have legal consequences with respect to the subjects of personal data or otherwise affect their rights and freedoms or the rights and freedoms of others.

«Personal data sale» – actions, as a result of which data and databases with personal data of persons are transferred from the Operator to third parties by making a transaction.

«Publicly available personal data» – personal data, access to which is granted to an unlimited number of persons with the consent of the subject, or which, in accordance with applicable law, are not subject to the requirement of confidentiality.

«Personal data confidentiality» – compulsory for the person who gained access to personal data, the requirement not to allow its distribution without the consent of the subject or other legitimate grounds.

«Device» – PC, mobile device, or virtual machine running on an operating system compatible with the Application with a compatible web browser installed.

«**Identifier**» - a unique identifier (alphanumeric code) of the Device belonging to the User, which is stored in the User's browser and used to identify it in the Application.

«Statistics» – information on the Application use, as well as the viewing and/or use of certain elements of the Application (windows, dialogs, interactive elements, pages, frames, content, etc.) collected through the use of Counters, cookies, web beacons and other similar technologies.

«**Token**» - a randomly generated unique set of characters mapped to certain confidential data (including bank card number), but not disclosing them, which such token may substitute in various transactions in order to preserve the confidentiality of the original data.

«**Files «cookie**», «**cookie**» – a small piece of data sent by a web server and stored on the User's device where the Counter is installed. Cookies contain small pieces of text and are used to store information about the browsing experience. They allow you to store and retrieve identification and other information on PCs, smartphones, phones, and other devices. Cookie specifications are described in RFC 2109 and RFC 2965. Other technologies are used for the same purpose, including data stored by

browsers or devices, identifiers associated with devices, and other software. All of these technologies are referred to herein as "cookies".

«**Web beacons**» – images in electronic form (one-pixel (1x1) or blank GIF images). Web beacons can help Administration recognize certain types of information on a User's device, such as cookies, time and date of page view, and the description of the page where the web beacon is placed.

«**Counter**», «**Tracker**» – part of the Application, a computer software that uses a piece of code responsible for analyzing cookies, collecting statistical and personal data of Users. Personal data is collected in an impersonal form.

«**IP-address**» – number from the numbering resource of the data network based on the IP protocol (RFC 791), which uniquely identifies the subscriber terminal (computer, smartphone, tablet, other device) or communication equipment included in the information system and belonging to the User when providing telematic communication services, including Internet access.

«**HTTP header**» – A line in an HTTP message containing a colon-separated name-value pair. The HTTP header format follows the general ARPA network text message header format described in RFC 822.

«**Applicable law**» – the laws of the country in which the Administration is incorporated or a resident. In some cases, the applicable law may be the laws of the country in which the User resides or is a resident of, if such legislation establishes the priority of its rules over the rules hereof.

1.2. All other terms and definitions appearing in the text thereof shall be interpreted by the Parties in accordance with applicable law, the current recommendations (RFC) of international Internet standardization bodies and customary rules of interpretation of the relevant terms in the Internet.

1.3. The terms and definitions herein may be used in singular or plural, as the context may require, and the terms may be spelled either capital or small letters.

1.4. The names of headings (sections), as well as the structure of the Agreement, are intended solely for the convenience of using the text of the Agreement and have no literal legal meaning.

1.5. This Policy has been developed in accordance with the requirements of international law, as well as applicable law. For Users located within the European Union, it also takes into account the mandatory requirements of the Regulation of the European Parliament and Council (EU) of 27.04.2016 No. 2016/679 "On the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repeal of Directive 95/46 / EC (General Data Protection Regulation) (GDPR) and the California Consumer Privacy Act (CCPA).

1.6. This Policy determines the procedure and conditions of personal data processing by the Operator, including the procedure for transferring personal data to third parties, the specifics of non-automated personal data processing, access to personal data, personal data protection system, the order of internal control and liability for violations in the processing of personal data, as well as other issues.

1.7. This policy shall take effect upon approval by the Operator and shall remain in effect indefinitely until replaced by a new policy.

1.8. The Operator is entitled to make changes to this Policy without the User's consent. All changes to the Policy shall be made by the Operator's administrative act.

1.9. This Policy applies to all personal data processing carried out through the Application without the use of automation tools. The Operator does not control and shall not be responsible for the services belonging to third parties, to which the User can go through the links posted in the Application.

2. LEGAL GROUNDS OF PERSONAL DATA PROCESSING

2.1. The Operator carries out User's personal data processing, guided by international acts in the field of personal data protection, acts of applicable legislation, as well as, with regard to Users located on the territory of the Russian Federation, the Law № 152-FZ, Users located within the European Union, Regulation of the European Parliament and Council (EU) of 27.04.2016 No. 2016/679 « On the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repeal of Directive 95/46 / EC (General Data Protection Regulation) (GDPR) and for Users residing in the State of California of the United States of America, the California Consumer Privacy Act (CCPA).

2.2. User's personal data is processed based on and pursuant to the Agreement regulating the procedure of using the Application and other transactions, agreements or contracts entered into between the User and the Operator, or based on the User's separate consent to such processing.

2.3. Processing of the User's personal data is carried out by the Operator only if the User is over 16 years old. If the User is under 16 years old, the consent of the User's legal representatives is mandatory, otherwise the Operator deletes the User's data

from the Application when a mismatch between the age and the required age is found. For Users who are residents of California, USA, the age limit is set at 13 (under the CCPA and the Children's Online Privacy Protection Act (COPPA)). For Users who are residents of the European Union, the general age limit is set at 16 years (according to the GDPR). If the requirements of the applicable law establish a lower or higher age, the provisions of the applicable law shall apply.

3. PURPOSES OF PERSONAL DATA COLLECTION

3.1. The Operator processes only those personal data that are necessary to use the Application or execute transactions, agreements and contracts with the User, except in cases where the rules of applicable law, including legislation of the European Union or the State of California, USA, provide for mandatory storage of personal data for a period specified by law, in particular in accordance with the laws on accounting and the rules of state archives organization.

3.2. When processing personal data, the Operator shall not combine databases containing personal data, which are processed for incompatible purposes.

3.3. The Operator processes the User's personal data for the following purposes:

3.3.1. use of personal data for the purposes of entering into and execution of the Agreement or any other transaction with the Operator;

3.3.2. use of personal data for the purposes of proper functioning of the Application in accordance with the Users' expectations, in particular for the correct identification of Users or for the correct provision of the functionality of the Application, if the result depends on the data provided;

3.3.3. placement of personalized advertising and/or other information in any section of the Application and interruption of use of the Application by advertising information;

3.3.4. marketing programs, various offers, promotions and advertising activities related to the Application;

3.3.5. undertaking statistical and other research on the use of the Application based on anonymized data;

3.3.6. compliance with the mandatory requirements of applicable laws, including those of the European Union or the State of California, USA.

4. VOLUME AND CATEGORIES OF PROCESSED PERSONAL DATA, CATEGORIES OF PERSONAL DATA SUBJECTS

4.1. The Operator may receive the User's personal data from various sources, in particular:

4.1.1. from the Application during their operation;

4.1.2. when the User operates the Application;

4.1.3. when the User contacts the technical support service;

4.1.4. when the User participates in the Operator's marketing campaigns, various offers, promotions and advertising events related to the Application.

4.2. Personal data allowed to be processed in accordance herewith and provided by Users who are natural persons using the Application by filling in the appropriate input fields when using the Application, may include the following information:

4.2.1. e-mail address;

4.2.2. phone number;

4.2.3. surname, name, patronymic.

4.2.4. identifier

4.3. Personal data processed in accordance herewith and automatically transmitted to the Operator while using the Application by means of the software installed on the User's Device may include the following information:

4.3.1. token;

4.3.2. HTTP-heading;

4.3.3. Device IP address;

4.3.4. cookie data;

4.3.5. data collected by counters;

4.3.6. data from web beacons;

4.3.7. browser information;

4.3.8. technical specifications of the Device and software;

4.3.9. technical data on the Application's operation, including dates and times of use and access;

4.3.10. identifiers of requested Application interface windows;

4.3.11. geolocation data.

4.4. In accordance herewith, the Operator shall process personal data of the following categories of personal data subjects:

4.4.1. natural persons using the Application in accordance with the Agreement on its use;

4.4.2. natural persons using the Operator's services under the Agreement, other contracts and transactions;

4.4.3. natural persons who do not use the Operator's services and do not use the Application, but visit publicly accessible pages of the Operator's websites.

4.5. Processing of certain categories of personal data of Users is carried out with the following features:

4.5.1 Information about the User. A number of data is used to provide the functionality of the Application related to the User's data, in particular the identifier, token. The token assigned to the User may be used to send messages and notifications to the User's Device (e.g. security or important warning messages and promotional materials). User's data such as e-mail address, phone number, surname, first name, patronymic may be processed by the Operator for the purpose of providing technical support to the User and communicating with the User regarding the use of the Application.

4.5.2. Information on Application Use. Such information is processed in order to study the Application's activity and its interaction with the User, in particular, how long it took the Application to perform a particular operation at the User's request, which functionality is used by Users more often than others, type of action performed on the Website (click, pointing, etc.), date and time of the action; URL of the page, Referer, screen resolution, class of the HTML element clicked on, information on the number of page views of the Website, clicks on selected hyperlinks, information on the facts of filling forms on the Website, including errors in filling them, information on using the Application interface (opening dialogs, transitions, launches, crashes, etc.). This information helps the Operator to solve problems with the Application, prevent fraudulent activities, improve the Application, increase its performance and make it more user-friendly.

4.5.3. Technical characteristics of the User's Device, including its IP address, and its software. Such information as Device type, operating system, IP address, network connection method, etc. may be necessary for the Operator to be able to take into account the nuances of the Application functioning on different Devices, in different networks and to ensure its compatibility with third-party software.

4.5.4. Information about the approximate location of the User. The Application may, both actively and in the background, collect User location data provided by the hardware of the User's Device only for the purpose of providing the User with services and information appropriate to their location.

4.6 The Operator does not process biometric personal data (information characterizing physiological and biological features of a person on the basis of which his/her identity can be established).

4.7 The Operator does not process special categories of personal data concerning race, nationality, political views, religious or philosophical beliefs, intimate life, except for cases provided for by applicable law.

4.8 The processing of personal data authorized by the personal data subject for dissemination is carried out on the basis of the personal data subject's consent to dissemination in compliance with the prohibitions and conditions for personal data processing established by the personal data subject.

4.9 If the personal data subject provides personal data in the process of using the Application or information interaction with the Operator in a larger volume than it is provided for by the necessity and functionality of the Application, the Operator has the right not to process such personal data. If the Operator processes such personal data, the processing shall be carried out in accordance with the rules established by this Policy. Consent to the processing of such data from the personal data subject shall be deemed to have been obtained by the Operator at the moment of providing such data.

5. PROCEDURE AND CONDITIONS OF PERSONAL DATA PROCESSING

5.1. The Operator processes the User's personal data using the Application without any means of automation in accordance with the regulatory legal acts of the applicable law, establishing the requirements for the personal data security during their processing and for the observance of the personal data subjects' rights. Such actions with personal data as use, clarification, distribution, destruction of personal data in relation to the User, are carried out with the direct participation of the Operator's personnel.

5.2. The Operator processes and retains the User's personal data for a period determined in accordance with the Agreement on the use of the Application, or which the Operator informed the User when receiving the User's consent to the processing of his personal data in another way (in a checkbox, in a text message, in an e-mail, etc.).

5.3. The User's personal data is kept confidential, except when the User voluntarily provides information about himself/herself for public access to an unlimited number of people.

5.4. The Operator is entitled to transfer the User's personal data to the processor, the recipient, third parties using advanced connection encryption methods via the secure protocol HTTPS in the following cases:

5.4.1. the User has requested this transfer from the Operator;

5.4.2. there is the User's consent for such actions;

5.4.3. transfer is necessary for the User to use certain functionality of the Application (for example, for authorization via social network accounts, specialized authorization services) or for execution of a certain agreement, contract or transaction with the User;

5.4.4. transfer of anonymized information to third-party services - service providers (payment and advertising services);

5.4.5. the transfer is stipulated by the applicable law or other legal regulations in the framework of the procedure established by the regulatory legal acts;

5.4.6. in case of assignment of rights to the Application, transfer of personal data to the recipient is required simultaneously with the transfer of all liabilities to comply with the terms hereof with respect to personal data received by him/her;

5.4.7. to protect the Operator's or third parties' rights and legal interests when the User violates this Policy or the Application Usage Agreement;

5.4.8. in other cases, stipulated by regulatory legal acts.

5.4.9. The Operator may transfer anonymized personal information of Users to the following third parties:

- Appodeal Inc., (1640 Borough Place, 4th Floor, McLean, Virginia 22102, USA) for the purpose of displaying advertising content. Privacy Policy: https://www.appodeal.com/privacy-policy;

- RevenueCat, Inc. (1032 E BRANDON BLVD #3003 BRANDON, FL 33511, USA) for the purposes of payment processing. Privacy Policy: https://www.revenuecat.com/privacy/;

- Yandex LLC 119021, Moscow, 16, Lev Tolstoy St., Moscow for the purposes of measuring metrics of the Application usage. Privacy Policy: https://yandex.ru/legal/confidential/index.html;

- Google Inc. (Firebase platform) (1600 Amphitheater in Mountain View, CA, 94043.) - for the purposes of collecting statistics. Privacy Policy: https://policies.google.com/privacy;

5.5 Also the processors may be:

- website hosting provider;

- operator of the electronic platform for distribution of the Application or the services offered through it (Apple AppStore, Google Play);

- other persons who will be assigned to process personal data on behalf of the Operator.

5.6. In case of personal data leak of the User residing in the European Union, the Operator, without undue delay and, if possible, not later than 72 hours after becoming aware of it, shall notify the competent supervisory authority of the European Union about the personal data leak, except in cases when the personal data leak would hardly cause risks for the rights and freedoms of natural persons.

5.7. If a violation of personal data protection may create a high degree of risk for the rights and freedoms of natural persons, the Operator, without unreasonable delay, shall notify the User of the personal data leak. Notification to the data subject is not required if any of the following conditions are met: (a) the Operator has taken appropriate technical and organizational protective measures, and such measures have been applied to the personal data affected by the leak, including such measures that display the personal data in an incomprehensible form to any person who has no right of access to it, among which cryptographic protection; (b) The Operator has taken follow-up measures to ensure that the high risk to the rights and freedoms of data subjects is no longer capable of probable realization; (c) disproportionate effort is required. In this case, a public announcement is made instead, or a similar action is taken whereby the data subjects are informed in an equivalent manner.

5.8. The Operator takes the necessary administrative and technical measures to protect the User's personal data from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other unlawful actions of third parties. In particular, all processed data is transmitted using advanced connection encryption through the secure HTTPS protocol.

5.9. The Operator together with the User takes all necessary measures to prevent losses or other negative consequences caused by the loss or unauthorized disclosure of the User's personal data.

5.10. The Operator is entitled to transfer personal data to inquiry and investigation authorities and other authorized agencies for the reasons stipulated by regulatory legal acts.

5.11. When collecting personal data, the Operator records, systematizes, accumulates, stores, clarifies (updates, changes), extracts personal data of Users who are citizens of the relevant country, using databases located in the territory of such country or another country, if it is allowed under the applicable law.

5.12. The Operator shall discontinue the processing of personal data of Users, which are processed with their consent, when the User's consent to their processing expires or when the User's consent to the processing of their personal data is withdrawn, as well as in case of discovery of unlawful processing of personal data or the liquidation of the Operator.

5.13. The Operator is entitled to perform trans-border transfer of Personal Data exclusively for the purposes specified in the Agreement.

5.14. Storage of Personal Data of citizens of the Russian Federation shall be carried out on the territory of the Russian Federation.

6. PERSONAL DATA COLLECTION THROUGH COOKIES, WEB BEACONS, AND COUNTERS

6.1. Cookie files and data from Counters transferred from the Operator to the User's Device and from the User to the Operator can be used by the Operator to achieve the purposes of personal data processing in accordance with the privacy and personal data processing policy.

6.2. The Operator uses different types of cookies and Counters in the Application, which serve different purposes and, depending on them, can be assigned to one of the following categories:

– "Mandatory", i.e. cookies, Counter data, which are strictly necessary for the functioning of crucial components of the Application, identification of the technical characteristics of the User's Device and the software used, as well as authorization and payment by the User;

– "Analytical", i.e. cookies, Counter data that allow the Application to recognize Users, count their number and collect information about their activities in the Application, including information about the actions performed in the Application;

– "Technical", i.e. Cookies, Counter data that collect information about Users' interactions with the Application in order to identify errors and test new features to improve the Application's performance;

– "Functional", i.e. cookies, Counter data that allow the User to receive certain features of the Application, interact with the Application interface and use its features, record information about the actions performed in the Application and customize the Application according to the User's needs in order to remember the information entered by the User, save the preferred language, location, etc;

– "Third-party", i.e. cookies, Counter data that collects information about the User, traffic sources, User's activity and advertisements displayed to the User, as well as advertisements that the User has made in the Application, in order to display advertisements that may interest the User, based on the analysis of the collected information. These cookies and Counter data are also used for statistical and research purposes.

6.3. The Operator does not explicitly request consent when using mandatory cookies and receiving mandatory data from Counters. If the User does not want his/her personal data to be collected through mandatory cookies, he/she can disable their provision by the Operator in the software (browser) on his/her Device. In this case, the Application functionality related to mandatory cookies will no longer be available to the User, which may result in complete inoperability or malfunction of the

Application. It is technically impossible to disable the mandatory Counters because they are part of the Application software code.

6.4. Functional and analytical cookies can be used by the Operator only with the User's consent, which is expressed as a general rule by accepting the Agreement and starting to use the Application. Otherwise, the User may refuse to use such cookies by disabling them in the Application settings without affecting its functionality. Disabling the Counters that collect functional and analytical data is technically impossible, because they are part of the Application software code.

6.5. The User agrees that his/her Devices and software used to operate the Application, depending on their version and configuration, may or may not have the ability to deny cookie operations for any or certain websites and applications, as well as the ability to delete previously received cookies (e.g., browser private mode).

6.6. The Operator is entitled to set a requirement for the User's Device to obligatory allow reception and receipt of cookies due to security reasons.

6.7. The structure of a cookie file, its content and technical parameters are determined by the Operator and may be changed without prior notice to the User. The User is entitled to receive all necessary information about cookies by sending a request to the Operator in accordance with the procedure set forth in the privacy and personal data processing policy.

6.8. Counters installed by the Operator in the Application can be used by the Operator to analyze cookies and collect personal data on the use of the Application in order to improve the quality of the Application, the level of usability, and to improve the Application. Technical characteristics of counter operation are determined by the Operator and are subject to change without prior notice to the User.

6.9. The Operator may use web beacons alone or in conjunction with cookies to collect information about the use of the Application. The User is entitled to block web beacons when using the Application by prohibiting the download of images in the settings of his/her software (browser).

7. ACCESS TO PERSONAL DATA

7.1. Only the Operator's and/or Processor's personnel authorized to work with the User's personal data by virtue of their official duties based on the list of persons authorized to work with personal data, which is approved by the Operator and/or Processor, are entitled to access the User's personal data.

7.2. The Operator and/or Processor keeps up-to-date the list of employees who have received access to personal data.

7.3. Access to the User's personal data by persons who are not employees of the Operator and/or the Processor is prohibited without the User's consent, except in cases stipulated by regulatory legal acts.

7.4. Access of the Operator and/or Processor's employee to the User's personal data ceases from the date of termination of labor relations or from the date the employee loses the right to access the User's personal data due to changes in his/her official duties, position or other circumstances in accordance with the procedure established by the Operator/Processor. In case of termination of labor relations, all media with the User's personal data, which were at the disposal of the dismissed Operator'/ Processor's employee, are transferred to the superior employee in the order established by the Operator/Processor.

8. UPDATING, CORRECTION, DELETION AND DESTRUCTION OF PERSONAL DATA

8.1. The User may at any time change, update, supplement or delete the personal data or any part thereof provided by him/her using the Application's interface.

8.2. In the event that the Operator independently identifies the fact of incompleteness or inaccuracy of personal data in the Application, the Operator shall take all possible measures to update the personal data and to make appropriate corrections.

8.3. In case of impossibility to update incomplete or inaccurate User's personal data, the Operator takes measures to delete them.

8.4. If it is found that the processing of the User's personal data is unlawful, the Operator stops processing the User's personal data and the User's personal data is subject to deletion.

8.5. In case of inoperability of the Application's interface or lack of Application's functionality to change, update, supplement or delete personal data by the User, as well as in any other cases the User may demand the Operator in writing to clarify his/her personal data, block or delete it because the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the claimed processing purpose.

8.6. The Operator makes the necessary changes to the personal data, which are incomplete, inaccurate or irrelevant, within a period not exceeding seven business days from the date of submission by the User of information confirming that the personal data is incomplete, inaccurate or irrelevant.

8.7. The Operator destroys illegally obtained or unnecessary for the claimed processing purpose the User's personal data within a period not exceeding seven business days from the date of submission by the User of information confirming that such personal data is illegally obtained or unnecessary for the claimed processing purpose.

8.8. The Operator notifies the User about the changes made and measures taken and takes reasonable measures to notify the persons to whom this User's personal data was transferred.

8.9. The User's rights to change, update, supplement or delete personal data may be restricted in accordance with the requirements of regulatory legal acts. Such restrictions, in particular, may provide for the Operator's obligation to retain personal data amended, updated, supplemented or deleted by the User for a period specified by regulatory acts and to transfer such personal data to state authorities in accordance with the established procedure.

9. RESPONSES TO USER REQUESTS FOR ACCESS TO PERSONAL DATA AND THEIR DELETION

9.1. The User is entitled to receive information from the Operator regarding the processing of his/her personal data, including information containing:

9.1.1. confirmation of personal data processing by the Operator;

9.1.2. legal grounds and purposes of personal data processing;

9.1.3. methods of personal data processing used by the Operator;

9.1.4. name and location of the Operator, information about persons (other than the Operator's employees) who have access to personal data or to whom personal data may be disclosed under a contract with the Operator or on the basis of regulatory legal acts;

9.1.5. processed personal data related to the respective User, the source of their receipt, unless another procedure for submitting such data is stipulated in the regulatory legal act;

9.1.6. terms of personal data processing, including the terms of their storage;

9.1.7. procedure for the User to exercise the rights provided for by the regulatory acts in the field of personal data;

9.1.8. information on cross-border data transfers made or suspected to have been made;

9.1.9. name or surname, first name, patronymic and address of the person processing personal data on behalf of the Operator, if the processing is or will be assigned to such person;

9.1.10. other information stipulated by regulatory legal acts.

9.2. The Operator provides the possibility to get acquainted with the processed and stored personal data in the Operator's information system free of charge upon the User's request within thirty calendar days from the date of receipt of the User's written request.

9.3. In the case of the Operator's refusal to provide information about the availability of personal data on the User or personal data to the User upon receipt of the User's request, the Operator shall provide a written reasoned response, which is the basis for such refusal, within a period not exceeding thirty calendar days from the date of receipt of the User's request.

9.4. The Operator provides an opportunity to send a request for deletion of personal data, information about which was received by the User by sending a request to the Operator's e-mail address specified in this Policy.

9.5. In case the User submits a request, the Operator deletes the personal data within thirty calendar days from the date of receipt of the User's written request.

10. INFORMATION ON THE IMPLEMENTED REQUIREMENTS FOR THE PERSONAL DATA PROTECTION

10.1. The personal data security during its processing in the personal data information system is ensured by the personal data protection system, which neutralizes current threats.

10.2. The Operator applies a system of personal data protection, including legal, organizational, technical and other measures to ensure the security of personal data, defined taking into account the current security threats to personal data and information technology used in information systems.

10.3. For personal data in respect of which the User's consent to its processing by the Processor has been given, the Operator is entitled to engage a Processor to ensure the security of such personal data during its processing in the information system on the basis of a contract.

10.4. When processing personal data in its information system, the Operator shall ensure:

10.4.1. Measures to prevent unauthorized access to the User's personal data and/or its transfer to persons unauthorized for access to such information;

10.4.2. Timely identification of unauthorized access to personal data;

10.4.3. Not to affect the technical facilities involved in the personal data processing, as a result of which their functioning may be disrupted;

10.4.4. The opportunity for immediate recovery of personal data modified or destroyed as a result of unauthorized access to it;

10.4.5. Continuous control over the security level of personal data.

10.5. In order to comply with the security requirements and to implement the personal data security system, the Operator introduced a private model of security threats to the personal data information system.

10.6. The operator has defined the level of personal data protection in the course of personal data processing in the personal data information system belonging to the Operator.

10.7. Based on the results of the determination of the personal data security level in the course of personal data processing in the personal data information system without the use of automation facilities, the operator has developed and implemented a set of measures to protect and ensure the protection and security of personal data.

10.8. The Operator uses technical facilities and software for personal data processing and protection, as well as maintains an electronic log of personal data protection facilities.

10.9. The Operator shall keep an electronic log of accounting and storage of portable data carriers containing personal data (if any).

10.10. The technical facilities ensuring the operation of the personal data information system shall be located in the premises owned by the Operator by right of ownership or other proprietary right (lease, gratuitous use, etc.).

10.11. All of the Operator's employees authorized to work with personal data, as well as those involved in the operation and maintenance of the personal data information system, are familiarized with the Operator's internal documents regulating the procedure for working with personal data.

10.12. The Operator has arranged training for employees on the procedure for the use of personal data protection facilities maintained by the Operator. Employees having permanent access to personal data and employees involved in the operation and maintenance of the personal data information system and personal data protection facilities are trained.

10.13. The Operator's internal documents stipulate that employees must immediately report to an appropriate official of the Operator about loss, damage or shortage of data carriers containing personal data, as well as about attempts of unauthorized access to personal data, its causes and conditions.

11. PERSONAL DATA PROCESSING CONSENT

11.1. The User shall decide to provide his/her personal data and give consent to its processing voluntarily, at his/her own free will and in his/her own interest.

11.2. The personal data processing consent given by the User is unrestricted, specific, informed, and conscientious.

11.3. In case of processing of the User's personal data on the basis and in execution of the Agreement regulating the procedure of using the Application, and other transactions, agreements or contracts entered into between the User and the Operator using the Application, such processing of the User's personal data does not require a separate consent.

11.4. In the event that the User's personal data is processed on the basis of his/her separate consent to such processing, expressed directly when using the Application by pressing the appropriate button, by checking the appropriate checkbox indicator, by sending an SMS message or an email, such consent to the personal data processing is provided by the User in the form of an electronic document, signed by a simple electronic signature in accordance with the Agreement governing the procedure of using the Application.

11.5. Consent to the personal data processing may be withdrawn by the User in accordance with the procedure established by regulatory legal acts.

12. FINAL PROVISIONS

12.1. Once the User starts operating the Application, he/she agrees to the terms hereof. In case the User does not agree with the terms hereof, the use of the Application must be immediately terminated.

12.2. This Policy and relations between the User and the Operator arising in connection with the application hereof shall be governed by the applicable law. In particular, Users located on the territory of the Russian Federation are subject to Law No. 152-FZ, on the territory of the European Union are subject to the GDPR. Users located in the State of California, USA - subject to the GDPR.

12.3. This Policy is permanently publicly available at the following link https://cdn.eppic.ai/docs/privacy.pdf

12.4. Any suggestions or questions about this Policy may be addressed by the User to the Operator's User Support Service by sending an email to: support@eppic.ai, the email address for Users located in California, the United States or the European Union: support@eppic.ai.