

# PRIVACY POLICY FOR THE MOBILE APP

## "THERMINAL"

### 1. DEFINITION OF CONCEPTS

" **Law** " means the Federal Law of the Russian Federation "On Personal Data" with all amendments and additions, as well as other legislative acts of the Russian Federation.

" **Controller** " means the person who is responsible for the processing and protection of Personal Data of Users located in the EU within the meaning of the General Data Protection Regulation of April 27, 2016 (hereinafter " **GDRP** ").

" **Mobile application** " is software (with all existing additions and improvements) designed to run on smartphones, tablets, watches and other mobile devices, and developed for a specific platform (iOS, Android, Windows Phone, etc.). For the purposes of this Policy, Mobile Application means the following software: THERMINAL.

" **Personal data** " means a set of personal data and / or non-personalized information about the User, provided by him to the Copyright Holder and / or automatically collected by the Copyright Holder and / or third parties.

" **Policy** " means this Mobile Application Privacy Policy (with all existing additions and changes).

" **User** " means a legal or natural person who has downloaded the Mobile Application to a smartphone, tablet, watch or any other mobile device and/or has activated such Mobile Application on one of these devices.

" **User Agreement** " means an agreement concluded between the Copyright Holder and the User regarding the procedure, rules and features of the User's use of the Mobile Application. The user joins such an agreement and does not have the right to make and / or demand any changes or additions to it. The user can read the terms of the User Agreement at the following link: [http://www.autoplugin.ru/terms\\_of\\_use.pdf](http://www.autoplugin.ru/terms_of_use.pdf).

" **Owner** " means the following person who owns the exclusive rights to own the Mobile Application:

*Autoplugin ES, Bolshoi Prospect PS 28, St. Petersburg, Russia,  
autoplugin.ru@gmail.com*

" **Processor** " means a person who, within the meaning of the GDRP, on behalf of the Controller, stores and/or processes Personal Data received from Users.

" **Cookies** " means small files sent to any mobile application or site and placed on the User's smartphones, tablets, watches and other mobile devices to improve the operation of such applications or sites, as well as the quality of the content placed in them.

## **2. RELATIONSHIPS TO WHICH THE POLICY APPLYS**

### **General provisions**

This Policy is used and applicable solely to Personal Data received from the User in connection with his use of the Mobile Application. The provisions of this Policy are aimed at:

- (1) determination of the types and types of personal data received, directions and purposes of use (processing) of personal data, as well as sources of obtaining such personal data; and
- (2) determination of the rights of the User in relation to the protection of the confidentiality of the Personal Data transmitted by him; and
- (3) identification of persons responsible for the processing and storage of Personal Data, as well as third parties to whom such data is disclosed (in whole or in part).

The rules of this Policy do not apply in the case of processing by third parties of Personal Data that is voluntarily provided by the User.

By installing and/or activating the Mobile Application on a smartphone, tablet, watch or other mobile device, the User agrees to the terms of this Policy and gives his consent to the Copyright Holder for the collection, processing, retention and storage of Personal Data in the manner and under the conditions provided for in this Policy.

If the User does not agree with the terms of the Policy and / or individual terms of the Policy are not clear to him, in this case the User is obliged to immediately stop using the Mobile Application.

### **User rights for the protection of personal data**

In connection with the provision of Personal Data, the User automatically receives the following rights:

- (1) receive data relating to their processing (grounds and purposes of such processing, methods of processing used, information about persons who have access to them or to whom they can be disclosed on the basis of an agreement or the Law).
- (2) receive data on the location and identification data of the persons performing the processing of Personal Data.
- (3) receive data on the retention periods of Personal Data.
- (4) to receive information about the completed or proposed cross-border transfer of Personal Data.

(5) appeal against the actions or inaction of the Copyright Holder to the authorized body for the protection of the rights of personal data subjects or in court.

(6) receive compensation for losses and / or compensation for moral damage in a judicial proceeding as a result of violations of the User's rights to the protection and protection of his Personal Data committed by the Copyright Holder and / or third parties.

(7) exercise other rights in the field of personal data protection provided for by the Law or the provisions of this Policy.

### **3. LIST OF PERSONAL DATA COLLECTED**

#### **Non-personally identifiable user information**

In connection with the use of the Mobile Application, the Copyright Holder may automatically collect and process the following non-personalized information about the User:

(1) information about traffic, the possible number of clicks made, logs and other data.

(2) information about the location of the User (geolocation). The User can disable geolocation at any time by changing the settings of the device from which he logged into the Mobile Application. Geolocation is used by the Mobile Application only when the User is actively using such application. When you exit the Mobile Application, geolocation ceases to function.

(3) information about the device (identification number, mobile operator network) from which you are logging in, operating system, platform, browser type and other information about the browser, IP address.

#### **Personal data about users**

The Copyright Holder does not collect any personal data about Users that allow him to be identified.

#### **Use of cookies**

This Mobile Application does not use Cookies .

## 4. PURPOSE OF COLLECTION AND PROCESSING OF PERSONAL DATA

### Determining the purposes of processing

The collection and processing of Personal Data is carried out for the following purposes:

- (1) for the operational and correct operation of the Mobile Application, improving the operation of the Mobile Application, improving the content of the Mobile Application, improving the internal architecture and functionality of the Mobile Application.
- (2) to identify the User.
- (3) to comply with the requirements of the Law.
- (4) to determine the location of the User.
- (5) for technical support of the Mobile application, identification of problems in its operation and their elimination.
- (6) to maintain communication with the User (communication).
- (7) to fulfill other obligations of the Copyright Holder that arose before the User.
- (8) for any other purpose, subject to obtaining separate consent from the User.

The processing of Personal Data is carried out on the basis of the following principles: (1) the lawfulness of the purposes and methods of processing; and (2) good faith; and (3) suitability of the purposes of the processing of Personal Data for the purposes predetermined and declared at the time of collection of such Personal Data; and (4) suitability of the scope and nature of the Personal Data being processed for the stated purposes of their processing.

### Conditions for the processing of personal data

The processing of Personal Data is carried out in the following cases: (1) obtaining consent from the User; or (2) achievement by the Copyright Holder of the goals provided for by an international treaty or the Law; or (3) the provision by the User of his Personal Data to an unlimited circle of persons; or (4) fulfillment of other obligations of the Copyright Holder to the User, including, but not limited to, provision of certain content to the User; or (5) saving the life or health of the User when consent to the processing of his Personal Data cannot be obtained in advance.

In case of depersonalization of Personal Data, which does not allow to directly or indirectly identify the User, the subsequent use and disclosure of such data to third parties is allowed and the rules of this Policy are no longer applied to them.

The Rightholder takes all possible measures to protect the confidentiality of the received Personal Data, except when the User has made such data publicly available.

The processing of Personal Data is carried out using automation tools and without the use of such automation tools.

## **5. THIRD PARTY ACCESS TO PERSONAL DATA**

### **Disclosure of personal data to third parties**

The Copyright Holder has the right to disclose Personal Data **(1)** to its affiliates, branches and representative offices opened both on the territory of the Russian Federation and on the territory of other states; **(2)** successors of the Copyright Holder, which arose as a result of its liquidation, reorganization or bankruptcy, and who received exclusive rights to own the Mobile Application; **(3)** to third parties solely for the purpose of providing the User with certain content or access to it; **(4)** to third parties when the User has given consent to the disclosure, transfer or processing of their Personal Data, as well as in other cases expressly provided for by the Law or this Policy.

The Right Holder discloses Personal Data only if **(1)** it is sure that third parties will comply with the terms of this Policy and take the same measures to protect the confidentiality of Personal Data that the Right Holder takes, and **(2)** consent to such disclosure has been previously expressed User and/or permitted by law.

## **6. ADVERTISING**

### **Mobile App Advertising**

The Copyright Holder does not place advertisements in the Mobile Application.

## **7. SENDING COMPLAINTS AND REQUESTS TO THE RIGHT HOLDER**

### **Request to stop processing personal data**

Each User has the right to express his objection to the Rightholder against the processing and / or storage of his Personal Data. Such an objection can be expressed as follows:

*sending a request to e-mail [autoplugin.ru@gmail.com](mailto:autoplugin.ru@gmail.com)*

### **Request for information about personal data**

If the User has questions related to the procedure for applying or using this Policy, the procedure and / or method of processing Personal Data, the User can ask such a question as follows:

*sending a question to e-mail [autoplugin.ru@gmail.com](mailto:autoplugin.ru@gmail.com)*

### **Change (update, addition, correction) or deletion of personal data**

The User has the right to change or delete Personal Data at any time by sending a special request to the Copyright Holder at the following address: [autoplugin.ru@gmail.com](mailto:autoplugin.ru@gmail.com).

The Rightholder has the right to refuse to change or delete Personal Data if such actions will lead **(1)** to a violation of the rules of this Policy; or **(2)** in violation of the Law; **(3)** the nature of the Personal Data is evidence in any litigation that has arisen between the Copyright Holder and the User.

## **8. TERMS AND PROCEDURE FOR STORING PERSONAL DATA**

Storage is carried out independently by the Copyright Holder.

Storage is carried out during the entire period of use by the User of this Mobile application.

The Right Holder undertakes to destroy or depersonalize his Personal Data immediately after the termination of the User's use of the Mobile Application.

## **9. ACCESS OF MINORS TO THE MOBILE APP**

### **Users in the Russian Federation**

The use of the Mobile Application is intended for persons over 18 years of age.

If the User is a minor, then he must immediately stop using this Mobile Application.

### **Users in the European Union**

The use of the Mobile Application is intended for persons aged 16 and over.

If the age of the User does not correspond to the allowable age for using the Mobile Application, in this case, he must immediately stop using this Mobile Application.

## **10. PERSONAL DATA PROTECTION**

Protecting the confidentiality of Personal Data is a paramount and important task for the Copyright Holder. The Rightholder adheres to all required international standards, rules and recommendations for the protection of Personal Data.

The Rightholder has implemented a number of technical and organizational methods aimed at protecting Personal Data from disclosure or unauthorized access by third parties.

## **11 . USERS LOCATED IN THE EUROPEAN UNION**

### **General provisions**

Since the Mobile Application is available to users from the European Union, the Copyright Holder undertakes to additionally comply with the provisions of the GDPR.

The controller in the understanding of this Policy is the Copyright Holder.

The Rightholder shall store Personal Data for a reasonable period necessary to achieve the purposes of processing, but not less than the period established by the local legislation of the Member State of the European Union, in whose territory the Mobile Application is available, for storing one or another type of Personal Data. Upon the expiration of the period established for storage, the Copyright Holder undertakes to immediately destroy or depersonalize such data.

### **User rights in the field of personal data protection**

Under Chapter 3 of the GDPR, Users located in the European Union have the following rights in the field of Personal Data protection: **(1)** the right to receive information about their Personal Data ("the right to be informed"); and **(2)** the right to access your Personal Data ("the right of access"); and **(3)** the right to rectification of Personal Data ("the right to rectification"); and **(4)** the right to erasure of Personal Data ("the right to erasure"); and **(5)** the right to restrict processing of Personal Data ("the right to restrict processing"); and **(6)** the right to portability of Personal Data to third parties ("the right to data portability"); and **(7)** the right to object ("the right to object").

## **12 . FINAL PROVISIONS**

### **Availability of policy text for review**

Users can read the terms of this Policy at the following link:  
[http://www.autoplugin.ru/policy\\_app\\_en.pdf](http://www.autoplugin.ru/policy_app_en.pdf).

This Policy was translated into English language for those Users who access the Mobile Application outside the Russian Federation. The original text (Russian) is available here:  
[http://www.autoplugin.ru/policy\\_app.pdf](http://www.autoplugin.ru/policy_app.pdf).

In case of discrepancy between the original text (Russian) and its translation, the original language shall prevail.

This version of the Policy is effective from September 1, 2022.

### **Changing and supplementing the policy**

This Policy may be changed from time to time. The Copyright Holder does not bear any responsibility to the User for changing the terms of this Policy without the permission and / or consent of the User.

The user himself undertakes to regularly check the provisions of this Policy for possible changes or additions.

### **Applicable law**

This Policy has been developed in accordance with the current legislation on the protection of personal data of the Russian Federation, in particular, with the provisions of the Federal Law of July 27, 2006 No. 152-FZ "On Personal Data" (with all additions and changes), the Federal Law of July 21, 2014 No. 242-FZ "On Amendments to Certain Legislative Acts of the Russian Federation in Part of Clarifying the Procedure for Processing Personal Data in Information and Telecommunications networks " (with all additions and changes), as well as the provisions of the General Data Protection Regulation of April 27, 2016 GDPR.

### **Disclosure risk**

Regardless of the measures taken by the Copyright Holder to protect the confidentiality of the personal data received, the User is hereby considered to be properly aware that any transfer of Personal data on the Internet cannot be guaranteed secure, and therefore the User carries out such transfer at his own risk.