PRIVACY POLICY FOR THE "BREVITY CODES" MOBILE APP

1. DEFINITION OF CONCEPTS

"Law" means the FederalLaw 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 responsible for the processing and protection of Personal Data of Userslocated in the EU within the meaning of the GeneralGeneral Data DataProtection ProtectionRegulation Regulationof 27 April 2016 (hereinafter referred to as "GDRP").

A "mobile application" is software (with all existing additions and improvements) designed to work on smartphones, tablets, watches, and other mobile devices,and developed for a specific конкретноиplatform (iOS,Android,Windows Phone , etc.). For the purposes of this article,̆ настоящеи Policies The Mobile app means the following software: BREVITY CODES.

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

"Policy" means this Privacy Policy of the Mobile application (with all existing additions and changes).

"User" means a legal entity or individual who has downloaded a Mobile Application on a smartphone, tablet, watch or any other mobile device and/or has activated such a Mobile Application on one of the specified devices..

"User Agreement" means an agreement concluded between the Copyright Holder and the User regarding the procedure, rules and featuresof the User's use of the Mobile Application. The User subscribes to this agreement and has no right to make and / or request any changes or additions to it.

"Copyright Holder" means the following person who owns the exclusive rights of ownership of the Mobile Application:

Yermilov Viktor Vladimirovich

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

1/7

2. RELATIONSHIPS COVERED BY THE POLICY

General provisions

This Policy is used and applies exclusively to Personal Data received from the User in connection with their use of the Mobile Application. Provisions of this Policy The policies are aimed at:

(1) determination of the types and types of personal data received, directions and purposes целеиof use (processing) Personal Data, as well as the sources of receipt of such Personal Data; and

(2) determining the User's rights to protect the confidentiality of the Personal Data transmitted to them; and

(3) identification of persons responsible for processing and storing Personal Data, as well as third parties to whom such data is disclosed (in whole or in part).

Rules of this article The Policies 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 App on a smartphone, tablet, watch, or other mobile device, the User agrees to the terms of this Agreement.даннои This Policy and gives its consent to the Right Holder to collect, process, retain and store Personal Data in accordance with the procedure and conditions provided for in this Policy. Politics.

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

User's rights to protect personal data

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

(1) receive data related to their processing (the grounds and purposes of suchprocessing, the methods of processing used, information about persons who have access to them or to whom they may be disclosed on the basis of a contract or law).

(2) receive data on the location and identification data of persons who process Personal Data.

(3) receive data on the retention periods of Personal Data.

(4) receive data on осуществленной или о предполагаемоиthe cross-border transferof Personal Data that has been made or is expected to be made.

2/7

(5) appeal against the actions or omissions of the Right Holder to the authorized bodyfor the protection of the rights of personal data subjects or in court.

(6) receive compensation for damages and/or compensation for moral damage in court as a result of violations of the User's rights to the protection and protection of his/her 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 law or the provisions of this Article. Politicians.

3. LIST OF PERSONAL DATA COLLECTED

Unpersonalized user information

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

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

(2) information about the device (identificationидентификационныиnumber, mobile operator network) that you are logging in from, operating system, platform, browser type and other browser information, IP address.

Personal data about users

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

4. PURPOSES
OF PERSONAL DATA COLLECTION AND PROCESSING Definition целеиof processing purposes Personal Data
is collected and processed for the following purposes:

(1) to analyze User behavior and identify preferences The user's access to a specific type of content.

(2) for the operationaland correct корректноиoperation of the Mobile Application, improving the functioning of the Mobile Application, improving the content of the Mobile Application, improving the internal architectureand functionality of the Mobile Application.

(3) to identify the User. (4) to comply with the requirements of The law.

3/7

(5) to provide technicalsupport for the Mobile App, identify problems in its operation, and fix them.

(6) to maintain communication with the User (communication).
(7) in order to fulfill other obligations of the Copyright Holder, which

occurred before the User.

(8) for any other purpose, subject to obtaining separate consent from the User.

Обработка Персональных данных осуществляется на основе принципов: The processing of Personal Data is carried out on the basis of the following principles: (1) the legality of the purposesand methods of processing; and (2) integrity; and (3) compliance of the purposes целеиof processing Personal Data with the purposes previously defined and declared when collecting such Personal Data; and (4) compliance of the scope and nature of the processed Personal Data with the declared purposes of their processingI.

Terms of personal data processing

Personal Data is processed in the following cases:: (1) obtaining consent from the User; or (2) achieving the Rights Holder's goalsstipulated by an international agreement or Law; or (3) providing the User with their Personal Data to an unlimited number of persons; or (4) fulfilling other obligations of the Rights Holder to the User, including, but not limited to, providing certain content to the User; or (5) saving the User's life or health when consent to the processing of their Personal Data cannot be obtained in advance. выполнения иных обязательств Правообладателя перед Пользователем, включая, однако не ограничиваясь, предоставление определенного контента Пользователю; или (5) спасения жизни или здоровья Пользователя, когда согласие на обработку его Персональных данных не удается получить заблаговременно.

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

The Copyright Holder takes all possible measures to protect the confidentiality of the Personal Data received, except in cases where 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 Rightholder has the right to disclose Personal Data (1) to its affiliates, branches and representative offices opened both in the territory of the RussianFederation and in the territory of other states; (2) to the Rightholder's legal successors who have emerged as a result of its use of the Service.

4/7

or bankruptcy, and who have obtained exclusive ownership rights to the Mobile Application; (3) to third parties solely for the purpose ofproviding 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 directly provided for by law or this Policy.третьим лицам, когда Пользователем было дано согласие на раскрытие, передачу или обработку своих Персональных данных, а также в иных случаях, прямо предусмотренных Законом или даннои Politics.

The copyright Holder discloses Personal Data only if (1) it is confident that third parties will comply with the terms of this Policy. (2) consent to such disclosure has been previously expressed by the User and/or is permitted by Law.

6. PLACING ADS
Advertising in THE mobile app
The copyright Holder does not place ads in the Mobile App.

7. SENDING COMPLAINTS AND REQUESTS TO THE COPYRIGHT HOLDER

Request to terminate the processing of personal data

EachUser has the right to object to the processing and/or storage of their Personal Data by the Copyright Holder. Such an objection may be expressed as follows:

Info@skydriver.pro

Request for information about personal data

If the User has any questions related to the order of application or use of this document According to the terms of this Policy, the procedure and / or method of processing Personal Data, the User can ask sucha question as follows:

info@skydriver.pro

8. ACCESS OF MINORS TO THE MOBILE APPLICATION Users on the territory of the RussianFederation The use
of the Mobile application is intended for persons over 4 years of age. Users in the European Union

5/7

Use of the Mobile App is intended for persons aged 4 years and older.

9. PROCEDURE FOR PERSONAL DATA PROTECTION

Protecting the confidentiality of Personal Data is a primaryand important важноиtask forthe Copyright Holder. The copyright holder adheres to all required international standards, rules and recommendations for the protection of Personal Data.

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

10. FINAL PROVISIONS

Availability of the policy text for review

Users can read the terms and conditions of this policy. Click on the followinglink: http://www.skydriver.pro.

This Policy can be translated into a foreignlanguage for those Users Пользователеиwho access the Mobile Application outside the Russian Federation. In case of any discrepancy between the original text (русскииRussian) and its translation, the original language will prevail.

This version of the Policy is valid from March 23, 2023..

Changing and updating the policy

This Policy is subject to change from time to time. The Copyright Holder does not bear anyresponsibility to the User for changing the terms of this agreement.даннои Policies without the User's permission and / or consent.

The User undertakes регулярноиto check the provisions of this policy on a regular basis.даннои Check the 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 Federal Law No. 152-FZ of July 27, 2006 "On Personal Data" (with all amendments and additions), Federal Law No. 242-FZ of July 21, 2014 "On the Amendment of Personal Data".amendments to certain legislative acts of the Russian Federation in terms of clarifying the procedure for processing personal data in information and telecommunications networks" (with all additions and amendments), as well as the provisions of the GeneralNo 242-ФЗ "О внесении изменений в отдельные законодательные акты Российской Федерации в части уточнения порядка обработки персональных данных в информационно-телекоммуникационных сетях" (со всеми дополнениями и изменениями), а также положениями Общего

6/7

регламента защиты персональных данных (General Data Protection Regulation ( Data Protection RegulationGDRP) of April 27, 2016.

Risk of disclosure

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