

CORPORATE PRIVACY POLICY

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PART I. Personal Data Processing Conditions in the Russian Federation

1. General Provisions

1.1. This Policy defines the procedure for processing personal data and ways to ensure the security of personal data in order to protect the rights and freedoms of a person and citizen when processing of his personal data, including the protection of privacy rights, personal and family secrets.

1.2. This Policy was developed in accordance with Federal Law of the Russian Federation No. 152-Φ3 dated July 27, 2006 "About Personal Data".

2. Principles and Conditions for the Personal Data Processing

2.1. The processing of personal data is carried out on the basis of the following principles:

- legality and justice;
- restrictions on the processing of personal data to the achievement of specific, predetermined and legitimate purposes;
 - processing only those personal data that meet the purposes of their processing;
 - the destruction or depersonalization of personal data upon the achievement of the goals of their processing or in case of the loss of the need to achieve these goals, if it is impossible to eliminate the violations of personal data, unless otherwise provided by law of the Russian Federation.

2.2. The company undertakes not to disclose to third parties and not to distribute personal data without the consent of the subject of personal data.

3. The Rights of Personal Data Subject

3.1. The subject of personal data makes the decision to provide his personal data freely, by his own will and in his own interest.

3.2. The personal data subject has the right to receive information concerning the processing of his personal data. The subject of personal data has the right to require the clarification of his personal data, their blocking or destruction.

4. Ensuring the security of personal data

The security of personal data is ensured by the implementation of legal, organizational, technical and program measures necessary and sufficient to meet the requirements of Russian legislation in the field of personal data protection.

5. Final provisions

5.1. Persons guilty of violating the rules governing the processing and protection of personal data bear material, disciplinary, administrative, civil or criminal liability in the manner prescribed by Russian laws.

5.2. This Policy is published in accordance with part 2 of Article 18.1 of Federal Law of the Russian Federation No. 152-Φ3 dated July 27, 2006 "About Personal Data".

PART II. Additional Conditions of Personal Data Processing

1. What data do we collect and for what purposes?

1.1. We may ask you to provide us with the following information voluntarily: (i) name and surname, (ii) email address, (iii) job title, (iv) company and type of company, (v) phone number.

1.2. We use this information to respond to the request you may have submitted to us through the contact form to request a demo or the contact form to report low quality ads. We will only use it to (i) contact you in order to answer to your request, (ii) redirect your request to the competent team and (iii) properly qualify your request.

1.3. If you decide to subscribe to our services, we will use the information above in order to handle your account and may request additional information such as other contact information and billing account information. We will use such information to operate and improve our Website and services such as to provide notices about your contract, to fulfill your service request, to request your feedback.

2. Information you provide automatically

2.1. When using or interacting with our Website, we may also automatically collect and use certain information from user's devices.

Specifically, this information may include IP address and advertising ID, the latter being a unique identifier attributed to the device. We may collect other information concerning devices such as browser type, device type, location data (as derived from the IP address), advertising ID, language and other technical information. We may also collect information about how device has been interacting on our Website, including the pages accessed and links clicked.

2.2. We use cookies (small text files containing a string of characters, stored in the user's device) and similar technologies to operate and improve our Website. They allow us to recognize and remember browser, language and other information.

We guarantee that we will not attempt to associate natural persons with online identifiers provided by their devices, applications, tools and protocols, such as internet protocol addresses, cookie identifiers or other identifiers such as radio frequency identification tags.

We guarantee that we will not attempt to combine online identifiers provided by devices with unique identifiers and other information received by the servers, for creating profiles of the natural persons and identify them.

3. On which grounds do we process Personal Data?

We collect and use Personal Data to fulfill our obligations regarding contracts and agreements with clients, partners and suppliers.

4. How long do we store your Personal Data?

4.1. The Personal Data you provide to us is stored for the duration strictly necessary to fulfill its purpose stated above (e.g. answer to your request, send you newsletters, duration of the contract).

4.2. Once the duration period has been reached, the data is then no longer active. For security and regulatory purposes it is stored in our archive databases in compressed form for a maximum of 12 months.

5. Contact us

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact our Privacy Team by email privacy@betweenx.com.

Additional rights for users from the European Economic Area ("EEA"), the United Kingdom ("UK"), or the United States of America (USA)

6. Your privacy rights

6.1. You may ask us at any time:

- to confirm your Personal Data is being processed and/or to provide you a copy of your Personal Data;
- to rectify your Personal Data if it is inaccurate or incomplete;
- to withdraw your consent;
- to erase your Personal Data, for instance if it is unlawfully processed or if you withdraw your consent;
- to restrict the processing of your Personal Data, (i) if the information is inaccurate, (ii) the processing is unlawful, (iii) you need us to retain the information after the retention for a legal claim;
- to provide you with an electronic file of your Personal Data, or to transfer your Personal Data to a third party, if technically feasible (portability).

6.2. We will respond within one month on your request. We may extend the response period to two months if such is necessary due to the complexity and number of requests. We will notify and explain the reasons of any extension to you. If we deny your request, we will inform you of the reasons of such denial.

7. Transfer of Personal Data outside of the EEA

Personal Data may be transferred to a partner located in a third country not providing adequate protection regarding data protection. With these partners, we sign contractual clauses to ensure an adequate level of protection.

PART III. Other sources of personal data

1. Access to personal data collected by other entities

1.1. Certain data about the Internet users and their devices may be collected when visiting Websites occurs. This data includes browser type, device type, location data (as derived from the IP address), advertising ID, language and other technical information. The data may be provided to us by publishers, advertisers, agencies, advertising platforms to participate in ad exchange.

1.2. We use cookies (small text files containing a string of characters, stored in the user's device) and similar technologies to conduct advertising campaigns.

We guarantee that we will not attempt to associate natural persons with online identifiers provided by their devices, applications, tools and protocols, such as internet protocol addresses, cookie identifiers or other identifiers such as radio frequency identification tags.

We guarantee that we will not attempt to combine online identifiers provided by devices with unique identifiers and other information received by the servers, for creating profiles of the natural persons and identify them.

2. Terms and conditions of obtaining personal data from other entities

2.1. We may receive personal data from publishers, advertisers, agencies, advertising platforms only on the condition that these entities undertake obligations to ensure the legality at all stages of the data processing.

2.2. The Internet user has the right not to provide the possibility of collecting the above-mentioned data, using the settings of his browser, by purchasing paid content, as well as expressing a refusal to provide them on the relevant Websites pages of publishers, advertisers, agencies, advertising platforms.

2.3. We take all legal, reasonable and commercially acceptable measures to ensure the security of personal data in order to protect the rights and freedoms of a person and citizen when processing of his personal data, including the protection of privacy rights, personal and family secrets.

3. Purposes and conditions of information transfer to other entities

3.1. The content of many Websites can be provided for a fee without advertising and free of charge, but with breaks for advertising. Advertisers are interested in providing advertising to their target audience. The data end user devices are necessary to segment audiences by location, language, sex, age, etc. parameters. This allows advertisers to broadcast only those ads that may be of interest to the end user.

3.2. We provide end user device data to such entities as publishers, advertisers, agencies, advertising platforms only during RTB auctions for the right to display advertising.

3.3. End user device data is stored only for the time required for RTB auctions.

4. Contact information

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact our Privacy Team by email privacy@betweenx.com.