

# PRIVACY POLICY FOR THE MOBILE APP

## ARVote

### 1. DEFINITION OF CONCEPTS

**"Mobile application"** is software (with all existing additions and improvements) designed to work on smartphones, tablets and developed for a specific platform (IOS, Android). For the purposes of this Policy, Mobile App means the following software: ARVote.

**"Data"** means a set of 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 or tablet and activated such Mobile Application on one of these devices.

**"Copyright Holder"** means the legal entity ARVCorp OÜ, which owns the exclusive rights to own the Mobile Application.

### 2. LIST OF 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). Approximate geolocation. User or device location information at a lower resolution than latitude and longitude and at least three decimal places of accuracy, such as from coarse location services. The approximate geolocation data collected in this application is not associated with the identity of the user
- (3) Geolocation is used by the Mobile Application only when the User is actively using such application. When you exit the Mobile Application, geolocation will no longer function.

## **Personal data about users**

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

## **Information about completed transactions**

The User through the Mobile Application can pay for goods or services by entering information about the payment card and the identification data of the owner of such a card in a special field. The User can make payments in the Mobile Application in the following ways:

- using the Apple Pay payment system.
- using the Google Pay payment system.

The collection and processing of personal data about the User in this case is carried out solely for the purposes of making payments, preventing fraud, as well as complying with other requirements of the Law.

The User consents to the access and collection by the Copyright Holder and the relevant payment system or banking institution through which / through which payment is made to such Personal Data, and also agrees to the privacy policy of the relevant payment system or banking institution.

## **3. PURPOSE OF DATA COLLECTION AND PROCESSING Definition of the purposes of processing**

- "Data collection" means the transmission of data from a device in a manner that allows you and/or your third party partners to access it for a longer period of time than is necessary to service the submitted request in real time.
- Collection and processing of data is carried out for the following purposes: 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.
  - (1) To comply with a requirement of the Law.
  - (2) To track orders/purchases made by the user through Mobile app.
  - (3) For technical support of the Mobile Application, identifying problems in his work and their elimination.
  - (4) To maintain communication with Users (communication).
  - (5) To fulfill other obligations of the Copyright Holder that have arisen in front of the User.
  - (6) For any other purpose, subject to separate consent from User.

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

#### **4. ADVERTISING**

Mobile App Advertising

The copyright holder does not place ads in the mobile application.

#### **5. TERMS AND PROCEDURE FOR DATA STORAGE**

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.

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

The mobile application can be used by persons under the age of 18. Since the Mobile Application does not collect personal data about Users, consent to the processing of personal data of minors is not required.

#### **7. FINAL PROVISIONS**

Availability of policy text for review

Users can read the terms of this Policy at the following link:

[https://arvote.ru/privacy\\_policy\\_ARVote.pdf](https://arvote.ru/privacy_policy_ARVote.pdf)

This version of the Policy is effective from May 21, 2021.

#### **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.