

PRIVACY POLICY

Sergii Bilak (hereinafter referred to as the "Company") is the developer of the mobile application "Root Access" (hereinafter referred to as the Mobile Application). The Company adheres to the principle of maintaining the confidentiality of its Users' data.

The Company's Privacy Policy (hereinafter referred to as the Privacy Policy) governs the procedure for collection, processing, and storage of any data provided by the User, including data collected or provided through the Mobile Application "Root Access".

By downloading and using this Mobile Application, the User confirms that they have read, accept, and agree to the procedures contained in this Privacy Policy. The User agrees to provide information necessary and sufficient for the proper and correct functioning of the Mobile Application. If the User disagrees with any of the terms of this Privacy Policy, please do not use the Mobile Application "Root Access" and do not provide any data.

Dear User!

By using the Mobile Application "Root Access", you entrust us with certain technical information. Please note that acceptance of this Privacy Policy means that you:

- Agree to the terms of collection, processing, storage, and transfer of technical data as specified below;
- Give full and unconditional consent to the processing of such information, including cross-border transfer of data;
- Agree to and undertake to comply with the terms of this Privacy Policy;
- Confirm that you are at least 18 years old, are a fully capable adult, and fully understand and control your actions, act voluntarily and in your own interest.

If you do not wish to grant the Company the right to collect, process, store, and transfer your data in whole or in any part, please do not download or use this Mobile Application.

Terms and Definitions

Mobile Application "Root Access" — software designed to operate on smartphones, tablets, and other mobile devices based on the Android and iOS platforms.

User — any individual who has downloaded and uses the Mobile Application "Root Access".

Device ID — a unique identifier assigned to the User's mobile device, used for analytics and attribution purposes through the AppsFlyer platform.

Data Processing — any action (operation) or set of actions (operations) performed with or without the use of automated means on data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction of data.

Cross-border Data Transfer — transfer of data to the territory of a foreign state, to a government authority of a foreign state, to a foreign individual, or to a foreign legal entity.

1. General Provisions

1.1 This Privacy Policy, applicable when using the Mobile Application, extends to the legal relations between the Company and the User of the Application and applies to information that the Company receives about the User during the use of the Application.

1.2 The collection and processing of data is carried out in accordance with the current regulatory legal acts of Ukraine, as well as other special requirements for the collection,

processing, and storage of data.

1.3 The Mobile Application "Root Access" does not collect, store, or process any personal data of the User. The Application does not require registration, does not collect names, email addresses, phone numbers, location data, contacts, photos, or any other personal information.

1.4 The only data collected by the Application is the Device ID (a unique device identifier), which is transmitted to the third-party analytics service AppsFlyer for the purposes of install attribution and app analytics. The Device ID is not linked to any personally identifiable information.

1.5 The Company also reserves the right to collect non-personal and non-confidential information about the use of the Application. Such information is collected, for example, during data transmission — "traffic data". This information also includes User navigation patterns within the Application and the use of its features. The obtained data is used for analysis and improvement of the Application's performance in order to develop, enhance, and provide Users with Application features that meet their needs, and to improve the quality and speed of its operation.

1.6 The Company takes necessary organizational and technical measures to protect User information from unauthorized, unlawful, or accidental access, misuse, destruction, modification, blocking, copying, distribution, and other unlawful actions by third parties.

2. Data Collection and Processing

2.1 The collection of the Device ID is carried out automatically when the User downloads and uses the Mobile Application. By using the Application, the User consents to this collection.

2.2 The Device ID is collected through automatic information collection technology provided by the AppsFlyer SDK integrated into the Application. The following technical information may be collected:

- Device ID (unique device identifier);
- Basic device information, including operating system type and version;
- Application install and usage events (e.g., first launch).

2.3 No personal data such as name, email address, phone number, location, contacts, photographs, or any other personally identifiable information is collected by the Application.

2.4 The Company does not bear responsibility for the actions of third parties and does not control the tracking technologies used by third parties or how they may be used. If the User has questions regarding any targeted content provided by third parties, it is recommended to contact the provider of such information directly.

3. Purposes of Data Collection and Processing

3.1 The Company collects and processes the Device ID solely for the following purposes:

- Install attribution — to determine the source from which the User downloaded the Application;
- Application analytics — to analyze aggregate usage patterns and improve the Application;
- Fraud prevention — to detect and prevent fraudulent installs.

3.2 The collected Device ID is not used for advertising, user profiling, or any purpose other than those listed in clause 3.1.

4. Data Transfer to Third Parties

4.1 The Device ID is transmitted to AppsFlyer Ltd., a third-party analytics service provider, for the purposes described in Section 3. AppsFlyer's own privacy policy governs how AppsFlyer processes this data.

4.2 The Company may transfer data to third parties in the following cases:

- The transfer is required for the proper functioning of the Application's analytics services;
- The transfer is required by the current legislation of Ukraine or other applicable legislation within the established procedure;
- In the event of a transfer of rights to the Application (sale of the Application), all obligations to comply with the terms of this Policy regarding the received information shall pass to the acquirer.

4.3 Processing of the Device ID is carried out without time limitation by any lawful means, including in information systems using automated means or without the use of such means.

5. Data Security

5.1 The Company takes appropriate measures to protect data in accordance with applicable legislation and implements necessary and sufficient organizational and technical measures to protect data. The applied security measures allow protection of data from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, and other unlawful actions by third parties.

5.2 All data transmitted from the Application is sent over an encrypted HTTPS channel using asymmetric encryption.

5.3 The Company is not responsible for the actions of Users aimed at violating or independently changing any privacy settings and/or violating security measures.

6. Changes to the Privacy Policy

6.1 The Company reserves the right to modify this Privacy Policy at any time and without prior notice or consent of the User.

6.2 The User is responsible for periodically visiting the Privacy Policy page to check for any changes and/or to review them.

6.3 Continued use of the Application by the User after changes are made to the Privacy Policy shall be deemed unconditional acceptance of these changes by the User.

6.4 In case of disagreement with the changes to the terms of collection, processing, and use of data, the User has the right to unilaterally discontinue the use of the Application and delete the Application from their device.

7. Other Conditions

7.1 The Application "Root Access" is not intended for Users under 18 years of age.

7.2 This Policy applies only to the Mobile Application "Root Access". The Company does not control and is not responsible for other mobile applications and third-party websites to which the User may independently navigate via links available in and associated with the Application "Root Access".

7.3 By accepting the terms of this Privacy Policy, the User gives unconditional and irrevocable consent to the transfer of their Device ID to third parties as described in this Policy.

7.4 By using the Mobile Application, the User guarantees that they do not intend to and will not use the functionality of the Application for the purpose of inciting racial discrimination, national hatred, promotion of violence, defamation, dissemination of information contrary to the foundations of public order and morality, as well as to carry out and distribute information and materials of an unlawful nature.

All suggestions or questions regarding this Privacy Policy should be directed to the email address:

support@bilak.dev