

## PRIVACY POLICY

Sergii Bilak (hereinafter referred to as the "Company") is the developer of the mobile application STRONG RUN Online Competitions (hereinafter referred to as the "Mobile Application"). The Company adheres to the principle of preserving the confidentiality of its Users' data.

Considering the above, the Company undertakes to adhere to the privacy policy governing the collection, processing, and storage of users' personal data, including through the mobile application. By downloading and using the mobile application, the User confirms their familiarity, consent, and acceptance of the terms of the privacy policy. Additionally, they understand that certain information may need to be provided for the proper functioning of the application.

The User has the right to refuse to provide any personal data and to use the application if they do not agree with the terms of the privacy policy. The use of the mobile application confirms the User's consent to the terms of collection, processing, and storage of their personal data, including the possibility of cross-border data transfer.

Mobile Application.

### 1. Terms and Definitions

Mobile Application - software designed to operate on smartphones, tablets, and other mobile devices based on the Android and iOS platforms. The Mobile Application is intended for providing the User with a service of obtaining funds on loan, including on the terms of financial credit.

User - any individual who has downloaded and uses the Mobile Application.

Personal Data - any information directly or indirectly related to the User, transmitted through the Mobile Application.

Providing Personal Data - actions aimed at disclosing personal data to a specific individual or a specific group of persons.

Processing of Personal Data - any action (operation) or set of actions (operations) carried out using automation tools or without using such tools with personal data, including collection, recording, systematisation, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalisation, blocking, deletion, destruction of personal data.

Cross-Border Transfer of Personal Data - the transfer of personal data to the territory of a foreign state, to the authority of a foreign state, to a foreign individual, or to a foreign legal entity.

### 2. General

2.1. The privacy policy applicable when using the Mobile Application applies to the legal relationship between the Company and the User and applies to the information that the Company receives about the User during registration and when using the Mobile Application.

2.2. The collection, processing, and storage of the User's personal data are carried out within the framework of current legislative acts of Ukraine, as well as other special requirements for the collection, processing, and storage of personal data.

2.3. The User's personal data includes data or components of information that allow identifying the User, such as:

User's surname, first name, patronymic (if any);

Citizenship;  
Gender;  
User's phone number;  
Email address;  
Affiliation with Foreign Public Officials;  
Status as a beneficial owner;  
Marital status and number of dependents in the family;  
Information about the mobile device used by the User;  
IP address (if necessary);  
Information about browsers and devices;  
Information from the server system log;  
Information collected through cookie files, pixel tags, and other technologies;  
Data on the use of the Application;  
Date and time of access to the Application on the User's device;  
Other aggregated information provided at the User's discretion.

2.5. Data automatically transmitted to the Mobile Application services during their use through software installed on the User's device.

2.6. The Company also reserves the right to collect information about the use of the Mobile Application, which is not personal data and is not confidential. Such information is collected, for example, when transmitting traffic data. The aforementioned information also includes user traffic patterns within the Mobile Application and its functionality usage. The obtained information is used for analysis and improvement of the Mobile Application's operation to develop, enhance, and provide Users with Mobile Application functionality that meets their needs, improves its quality, and performance.

2.7. The Company takes necessary organisational and technical measures to protect the User's personal and other information from unlawful, unauthorised, or accidental access, unlawful use, destruction, alteration, blocking, copying, distribution, as well as from other unlawful actions by third parties.

### **3. Collection and Processing of Personal Data**

3.1. The collection and processing of the User's personal data are carried out with their knowledge and consent provided in accordance with clause 9.3 of this Privacy Policy.

3.2. When downloading and using the Mobile Application, the User utilises technology for automatic collection and tracking of information to collect certain types of personal data, including:

3.2.1. Usage information, including data on input and use of other informational resources associated with the User, to which the User has access and uses in the Mobile Application.

3.2.2. Device information, including information about the User's mobile device and internet connection, including unique device identifiers, IP address, operating system, browser type, information about the mobile network, and device phone number, etc.

3.3. During the User's use of the Mobile Application, the Company also collects real-time information about the device's location using beacons and location services, geolocation data. Location information may be used to show how far the User is from other users of the Mobile Application.

The User can disable the location information provision function through their device settings, although this may limit the Mobile Application's functionality.

3.4. When using the Mobile Application or its content, third parties may use automatic information collection technologies to gather information about Users or their devices. Such third parties may include advertisers, ad networks, and ad servers.

Third parties may use tracking technologies to collect information about Users during the use of the Mobile Application.

3.5. The Company is not responsible for the actions of third parties and does not control the tracking technologies used by third parties and how they may be used. In case the User has any questions regarding advertisements or other targeted content provided by third parties, we recommend contacting the provider of such information directly.

#### **4. Objectives of Personal Data Collection and Processing**

4.1. The Company collects, processes, and stores personal information necessary to ensure the proper and efficient functioning of the Mobile Application and/or the performance of contracts with the User.

4.2. The User's personal data obtained during the use of the Mobile Application is collected and processed by the Company for the following purposes:

4.2.1. User identification, including during registration in the Mobile Application and creation of the User's account, to ensure the proper functioning of the Mobile Application.

4.2.2. Providing the User with access to personalised resources of the Mobile Application.

4.2.3. Establishing communication with the User, including sending messages, inquiries regarding the use of the Mobile Application, changes to the Mobile Application's functionality, availability of updates to the Mobile Application, changes in any products or services offered or provided by the Company, etc.

4.2.4. Determining the User's location to ensure security and prevent fraud.

4.2.5. Confirming the accuracy and completeness of the personal data provided by the User.

4.2.6. Providing the User with customer and technical support in case of problems related to the use of the Mobile Application.

4.3. The Company has the right to use the collected information to display advertising messages to the targeted audience of advertisers. In doing so, the Company does not disclose the User's personal data for these purposes without the User's consent, or it uses them in anonymised form.

#### **5. Conditions of User Personal Data Processing and Transfer to Third Parties**

5.1. Regarding the User's personal information, its confidentiality is maintained, except in cases of voluntary provision of information by the User for general access to an unlimited number of persons. When using certain functional services of the Mobile Application, the User gives consent to the disclosure of personal data.

5.2. The Company has the right to transfer the User's personal data to third parties in the following cases:

5.2.1. The transfer is necessary for the User to receive a certain service.

5.2.2. The transfer is provided for by current legislation of Ukraine or other legislation applicable to certain legal relations with the User within the established procedure.

5.2.3. In case of the Mobile Application's rights transfer (sale of the Mobile Application), all obligations regarding compliance with the terms of this Policy concerning personally obtained information are transferred to the acquirer.

5.3. Processing of the User's personal data is carried out without time limitation by any lawful means, including in personal data information systems using automation tools or without using such tools.

## **6. Access and Correction of User Personal Data**

6.1. The Company has the right to delete the User's account with all collected personal data of the User if the User fails to comply with any of the terms of the Mobile Application user agreement or in case of using the Mobile Application in violation of Ukrainian legislation.

6.2. All data collected during registration and use of the Mobile Application by the User, including the User's personal data, messages, feedback, comments, transmitted multimedia files, are stored in the Mobile Application database in accordance with the requirements of international standards and Ukrainian legislation and can be deleted only by the Company at the User's request.

## **7. Data Security**

7.1. The Company ensures proper protection of personal and other data in accordance with the law and takes necessary and sufficient organisational and technical measures to protect personal data. Implemented security measures, in particular, allow protecting personal data from unauthorised or accidental access, destruction, alteration, blocking, copying, dissemination, as well as from other unauthorised actions of third parties with them.

7.2. Information provided by Users is stored on secure servers behind firewalls.

7.3. All data provided by the User is transmitted over an encrypted HTTPS channel using asymmetric encryption.

7.4. Any transfer of personal data and other personal information is carried out by the User on a voluntary basis under their responsibility.

7.5. The Company shall not be liable for any actions of Users aimed at violating or independently changing any privacy settings and/or breaching security measures.

## **8. Changes to this Privacy Policy**

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

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

8.3. Further use of the Mobile Application by the User, after changes have been made to the Privacy Policy, is considered as the User's unconditional acceptance of these changes.

8.4. In case of disagreement with the changes in the terms of collection, processing, and use of personal and other information, the User has the right to unilaterally terminate the use of the Mobile Application and delete the Mobile Application from the device.

## **9. Miscellaneous**

9.1. The Mobile Application is not intended for Users who have not reached the age of 18.

9.2. This Policy applies only to the Mobile Application "STRONG RUN Online Competitions" The Company does not control and is not responsible for other mobile applications and third-party websites that the User may independently access through links available and associated with the Mobile Application "STRONG RUN Online Competitions"

9.3. By accepting the terms of this Privacy Policy, the User unconditionally and irrevocably consents to the transfer of their personal data to third parties.

9.4. Provided personal data may be modified (updated, supplemented) by the User at their discretion.

9.5. The Company is not responsible for the provision of inaccurate data by the User. The User bears full responsibility for the information provided. In this regard, the Company assumes that the User provides accurate and sufficient personal information on issues proposed in the Mobile Application and that the User maintains this information up to date.

9.6. By registering and using the Mobile Application, the User guarantees that they have no intention and will not use the functionality of the Mobile Application to incite racial discrimination, national hostility, propagate violence, spread libel, information contrary to the fundamentals of law and morality, as well as commit and distribute information and materials of an illegal nature.

9.7. Any suggestions or questions regarding this Privacy Policy should be reported via email to [feedback@bilak.dev](mailto:feedback@bilak.dev)

9.8. The Company shall not be liable for any actions of Users aimed at violating or independently changing any privacy settings and/or breaching security measures.