# **Privacy Policy**

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# **Privacy Policy**

#### 1. WHO WE ARE AND HOW TO CONTACT US?

- 1.1 ROZUM VISION LIMITED (hereinafter referred to as "ALGO" or "We") is an organization incorporated in the territory and under the laws of the United Kingdom of Great Britain and Northern Ireland (registration number: 12098110, providing services for uploading (and downloading) and depositing files containing algorithms, source codes and (or) interfaces of computer programs through the developed online service (hereinafter the "Service"), posted on the Internet site https://algo.id (hereinafter the "Site"), and registered at: 12 Mulberry Place, Pinnell Road, London, England, SE9 6AR.
- 1.2. When you use Our Site and (or) Service or interact with Us in any digital means available to You (for example, visiting and viewing pages of our Site; using the functionality presented on the Site; uploading (downloading), installing and using Our official applications (hereinafter "Application" or "Applications"); sending electronic messages, etc.) and non-digital means (for example, sending physical letters to Our postal address; contacting Our specialists by telephone, etc.), you share with Us with your personal data.

We collect, store and process (use) such personal data only in the ways and only for the purposes that are defined in this Policy.

In this regard, in relation to you and your personal data, We are the operator of personal data. This means that We, alone or jointly with others:

- --- We collect (receive), store and process (use) your personal data;
- Determine the list of your personal data that We will collect (receive), store and process (use);
- Determine the list of goals for the achievement of which We will collect (receive), store and process (use) your personal data;
- We define a list of methods and means of collecting (receiving), storing and processing (using)
   your personal data;
- We define the list of material, technical and legal measures for the protection of your personal data.

Due to the fact that We are an organization incorporated in the territory and under the laws of the United Kingdom of Great Britain and Northern Ireland, We, as the operator of personal data (in accordance with the requirements of British personal data protection law), bear and properly fulfill our obligations to be included in the Register of Personal Data Operators and on payment of the corresponding annual Personal Data Protection Fee.

1.3. Any questions you may have related to how We collect, store, process (use) and protect your personal data, you can ask our **Inspector for the Protection of Personal Data**. In addition, you can contact Our Inspector for the Protection of Personal Data in cases when you want to exercise any of your rights in relation to your personal data or when you have questions about the content or procedure for exercising your rights in relation to your personal data.

### 1.4. If you are:

- A national of the United Kingdom of Great Britain and Northern Ireland and (or) are on its immediate territory; and (or)
- A citizen of any member state of the European Union and (or) stay on the territory of any member state of the European Union; and (or)
- A citizen of any country that is not a member of the European Union, and (or) are located on the territory of any country that is not a member of the European Union

You should contact Our Inspector for the Protection of Personal Data, who oversees the processing (use) and protection of personal data directly in the above territories, in any way convenient for you from the list below:

# CONTACTS OF THE INSPECTOR FOR THE PROTECTION OF PERSONAL DATA IN THE TERRITORY OF THE GREAT BRITAIN AND OTHER COUNTRIES

Postal address: 12 Mulberry Place, Pinnell Road, London, England, SE9 6AR

**Email address:** alex.blyumin@algo.id **Phone number**: +442045770253

#### 2. WHY DID WE DEVELOP THIS POLICY?

We value the trust you place in Us when you share your personal data. We recognize that the right to privacy is one of the fundamental rights of every person, and we also recognize the value of your personal data to you and understand the importance and necessity of maintaining confidentiality and ensuring the security and protection of your personal data.

Due to the fact that We are focused on conducting our business activities mainly in the European Union and the United Kingdom, the provisions of this Policy have been developed in accordance with the EU General Data Protection Regulation (GDPR) and the UK Personal Data Protection Act of 23 May 2018 (which complements the GDPR and expands its scope within the UK).

The abovementioned literally means the following: We do not knowingly assume and do not intend to carry out targeted and systematic collection, storage and processing (use) of personal data of individuals located in other jurisdictions; nor do we expect and do not intend to carry out targeted and systematic monitoring of the behavior of such persons on the Internet in order to identify their needs in Our Service and offer them Our services.

However, if individuals from other jurisdictions share their personal data with Us - We declare that storage, processing (use) and protection of their personal data will be carried out by Us on a non-discriminatory basis in accordance with the provisions of this Policy and, if possible, with taking into account the requirements for the collection, storage, processing (use) and protection of personal data of such persons, imposed by their national legislation.

In this Policy, We will tell you in a simple and understandable form how We collect, store, process (use) and protect your personal data. We will also tell you what rights you have in relation to your personal data and how you can exercise them.

In this regard, We strongly recommend that you fully read this Policy and familiarize yourself in the future with other notifications that We may send you in certain cases related to the collection, storage, processing (use) and protection of your personal data, so that you are always fully aware of how and why We collect, store, process (use) and protect your personal data.

#### 3. SCOPE OF THIS POLICY

3.1. This Policy is developed and applied in relation to your personal data that is collected and processed (used) by Us when using our Service and when interacting with Us by performing the necessary actions on the Internet (for example, when visiting and using Our Site; downloading (uploading), installing and using Our official applications (hereinafter referred to as the "**Applications**"); contacting Us by sending emails, etc.) and when contacting Us in non-digital ways (for example, when contacting Us by sending physical letters to Our mailing address; when communicating with Our specialists by telephone, etc.) ... Also, this Policy applies to your personal data, which in certain cases We have the right to receive from

open and public sources or from third parties; and also which We in certain cases receive when using your personal data already available to Us.

3.2. This Policy applies to all websites, domains and subdomains, applications, services, products and subscriptions, etc. owned by Us and Our subsidiaries.

#### 4. CHANGES TO THE POLICY. CURRENT AND PREVIOUS EDITIONS.

- 4.1. We are constantly monitoring the compliance of the provisions of this Policy with the provisions of legislation in the field of personal data protection. In this regard, We can make changes or additions to the text of this Policy at any time. However, We guarantee that We will take reasonable and necessary measures to bring to your attention the complete and clearly stated information about the changes and additions made by Us to this Policy (including by sending you appropriate notifications in the interface of your personal account, to your email address). mail, etc.).
- 4.2. The current version of this Policy is always available for reading online, printing or downloading to your technical device from the Privacy Policy section of Our Site.

In addition, at any time you can write to Us at the following e-mail address and request the latest version of this Policy: info@algo.id

4.3. If you want to receive the previously valid versions of this Policy, you can also write to Us about this at the abovementioned e-mail address. We will gladly send you copies of previous versions (provided that other editions of this Policy previously existed).

### 5. TERMINOLOGY AND INTERPRETATION

- 5.1. The words "We", "Us", "Our" and their derivatives implies ROZUM VISION LIMITED and Algo.
- 5.2. The words "you", "yours" and their derivatives means persons who share their personal data with Us (data subjects).
- 5.3. This Policy contains basic concepts related to personal data. We use such concepts in the context of this Policy in the meanings in which they are used in legislation on the protection of personal data, applicable to this Policy and to the relationships regulated by it.

For the purpose of ease and accessibility of your understanding of such concepts and your interpretation of their meanings, We provide the relevant concepts and their interpretation directly in the text of those sections of this Policy that are devoted to issues related to such concepts.

### 6. PRINCIPLES IN ACCORDANCE WITH WHICH WE PROCESS (USE) YOUR PERSONAL DATA

When processing your personal data, We are guided by the following fundamental principles of processing (using) personal data:

Nº	Principle	Requirements	What are we doing to comply?	
		The processing (use) of your	We make sure that at each specific	
1	Legality of processing	personal data must be carried	instance when We process (use)	
1.		out in accordance with the	your personal data, We have at	
		law	least one basis for this specified in	

			the legislation. When processing (using) your personal data, We rely mainly on the following legal grounds for their processing (use):
2.	Fair handling	The processing (use) of your personal data should be carried out taking into account the reasonable expectations that you had at the time of making the decision to provide us with your personal data.	We have developed and are using technical solutions that allow Us to timely inform you in a simple and accessible form about all changes We make to the text of this Policy.
3.	Processing transparency	The processing (use) of your personal data should be carried out with the use of organizational and technical measures that allow, before the collection and processing (use) of your personal data, to convey to you in the most simple and accessible form information that reveals to you the entire process of collection, processing (use) and protection of your personal data, so that you are always fully aware of who We are, as well as how and why We collect, store, process (use) and protect your personal data.	We have developed and published the text of this Policy in the public domain on the Internet.  We have developed and are using special technical solutions that allow Us, when necessary, to send you additional notifications related to the collection, storage, processing (use) and protection of your personal data.  We have appointed an Inspector for the Protection of your Personal Data and published his contact information in the public domain so that you can contact him at any time and get the advice you need on any questions you have about how We collect, store, process (use) and protect your personal data. We have appointed an Inspector for the Protection of your Personal Data and published his contact information in the public domain, so that you have the opportunity to contact him at any time and get the advice you need on any questions

			you have about how We collect, store, process (use) and protect your personal data.  We have developed and are using special technical solutions that allow you to exercise your rights in relation to your personal data in the fastest and most efficient way.
4.	Processing restrictions	The purposes of processing (using) your personal data should:  - Do not contradict legislation; and  - Be specifically identified and communicated to you prior to the collection and processing (use) of your personal data by Us.	We made sure that:
5.	Data minimization	Personal data only that is minimally necessary and sufficient to achieve the stated purposes of processing (use) should be collected and processed (used) by Us.	We do not collect or process (use) your personal data, which is redundant in relation to the stated purposes of processing (use) of your personal data.  In addition, when the stated purposes of processing can be achieved by Us without the need to collect and process (use) your personal data, We do not collect or process (use) your personal data.
6.	Accuracy and relevance	When processing (using) your personal data, all reasonable	We provide you with reasonable access to your personal data.

		measures should be taken to ensure the accuracy and relevance of your personal data.	We have developed and are using special technical solutions that allow you to view the personal data you previously provided, update (clarify, change) and delete it if such personal data is found to be inaccurate or outdated.
7.	Storage limits	It is prohibited to store your personal data indefinitely in a form that allows you to identify you.	We maintain strict control over the observance of the terms of storage of your personal data and do not store your personal data for longer than the period that is necessary for Us to achieve the goals of collection and processing (use) of your personal data stated by Us, or to comply with certain legal requirements for certain categories of your personal data for a longer storage period.  In addition, We have provided a system for limiting the storage time of all backup copies of your personal data. The storage period for backups of your personal data is 25 calendar days.
8.	Integrity and confidentiality	When processing (using) your personal data, such legal and organizational and technical measures should be taken to protect your personal data, which prevent any attempts of unauthorized access to your personal data, their unauthorized or illegal processing (use); as well as prevent any situations that may lead to accidental deletion (destruction) of your personal data.	The information architecture of Our website has been designed and developed in accordance with the principles of confidentiality by default, which are internationally recognized as one of the leading standards in the field of information security.  In addition, as additional security measures for your personal data, We use some of the most powerful and market-leading technical tools, solutions and products that provide the highest level of security and protection of your personal data.

9.	Accountability	All operations on the processing (use) of your personal data should be carried out in such a way that, if necessary, We could prove that they were carried out exclusively in accordance with the abovementioned principles of processing (use) of your personal data	We maintain special registers for recording information about all actions performed by Us with your personal data.
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#### 7. WHOSE PERSONAL DATA DO WE COLLECT?

- 7.1. Personal data can be any information that points to you personally, or with the help of which We can directly or indirectly determine your identity. So, We can collect, store and process (use) your personal data if:
  - You are an unregistered visitor to Our Site;
  - You are a registered user of Our Service and (or) a recipient of Our services; or
  - Your personal data was provided to Us by a registered user of Our Service and (or) a recipient of Our services.
- 7.2. We do not purposely and knowingly collect or request personal data from children under the age of 13 (thirteen) years. This is called the age of consent. That is, until you reach a certain age, you will need to have the consent of your parents or other legal representatives.

In most countries, you can independently confirm your consent to the processing (use) of your personal data if you have reached the age of 13 (thirteen) years. Due to the fact that a number of individual changes have been made to the relevant European legislation on the protection of personal data, the age of consent may differ in different countries of the European Union and vary from 13 to 16 years. Therefore, before creating an account on Our Site, We ask users ages 13 (thirteen) to 16 (sixteen) years old, located in the territory of individual European countries, to confirm that they have the consent of their parents or legal representatives to the processing (use) of their personal data. Therefore, it is important for us to know which country you live in.

If you live in the UK, Ireland, Latvia, Czech Republic, Denmark, Poland, Spain or Sweden - you acknowledge that by accepting this Policy and using Our Site and the Services provided on it, you have reached the age of 13 (thirteen) years. In this case, additional consent from adults is not required.

If you live in Slovakia, Germany, Hungary, Lithuania, Luxembourg or the Netherlands and you are under 16 years old - you confirm that you register on Our Site with the consent of your parents or legal representatives. We, in turn, will take all necessary measures to verify this fact.

If you live in France and you are less than 15 years old, you confirm that you register on Our Site with the consent of your parents or legal representatives. We, in turn, will take all necessary measures to verify this fact.

If you live in Austria and you are under 14 years old, you confirm that you register on Our Site with the consent of your parents or legal representatives. We, in turn, will take all necessary measures to verify this fact.

7.3. If you are a parent or legal representative of a child who has not reached the appropriate age of consent and you have reason to believe that he provided us with his personal data without your consent, please contact Our Inspector for the Protection of Personal Data in any of the following ways:

# CONTACTS OF THE INSPECTOR FOR THE PROTECTION OF PERSONAL DATA IN THE TERRITORY OF THE GREAT BRITAIN AND OTHER COUNTRIES

Postal address: 12 Mulberry Place, Pinnell Road, London, England, SE9 6AR

**Email address:** alex.blyumin@algo.id **Phone number:** +442045770253

### 8. HOW AND WHAT PERSONAL DATA WE COLLECT (RECEIVE) AND ON WHAT BASIS?

Personal data can be any information that points to you personally, or with the help of which We can directly or indirectly determine your identity. Depending on the nature of your interaction with Us at any given moment, the composition of the categories of your personal data that We collect may change.

In any case, We do not collect any of your personal data that belong to special categories of personal data (in particular, information about your race or ethnicity; information about your religious or philosophical beliefs and beliefs; information about your sex life and (or) sexual orientation; information about your political views; information about your membership in trade unions; information about your health; as well as your genetic or biometric data). In addition, We also do not collect any information about your criminal charges or convictions.

In order to illustrate as clearly as possible to you the process of collecting (receiving) Your personal data and their processing (use) and disclosure to third parties to achieve the goals stated in this Policy, We have formed the following table (which will tell you what categories of your personal data We collect (we receive), process (use) and disclose to third parties and at what stage; for what specific purposes We collect (receive), process (use) and disclose your personal data and on what legal basis):

	Categories of Personal Data	Collection (Receiving) Stage	Source of Collection (Receipt)	Purpose of Collection and Processing	Basis for Collection and Processing	Transfer and Purpose of Transfer
1.	Identity data					
	Your full name (first name, last name, middle name)	<ul> <li>Registration</li> <li>on the Site;</li> <li>and (or)</li> <li>Filling in</li> <li>information</li> <li>about</li> <li>yourself in</li> <li>your account.</li> </ul>	-Registration form on the Site; and (or) - IPChain ID service.	- Identification of you as a user for the purpose of depositing OIP.	- Your consent to the processing of your data; and (or) - Fulfillment by Us of Our obligations to you from the contract.	- IPChain ID service for identification (authentication) of you as a user.
	Citizenship	– Filling in information about	<ul><li>Form in your</li><li>user account.</li><li>Technical</li><li>means and</li></ul>	- Prevention of the facts of registration on the Site of	- Your consent to the processing of	Not transferred to third parties.

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	yourself in	technologies	persons who have	your data; and	
	your account.	used to	not reached the	(or)	
	– When We	determine your	required age for	<ul><li>Fulfillment</li></ul>	
	receive	IP address.	concluding	by Us to You of	
	information	The IP address	transactions and	Our obligations	
	about your	is basic	for providing their	under the	
	country by	network	personal data in	contract; and	
	IP-address.	information,	the absence of	(or)	
		the data about	the consent of an	– Our	
		which We	adult, the age of	compliance	
		receive from	consent.	with the	
		the server.	<ul><li>Determination</li></ul>	obligations	
		the server.	of which country	that are	
		•	legislation should	imposed on Us	
			be guided by Us	as an operator	
			when processing	by law; and	
				•	
			your personal	(or)	
			data.	– Our	
			- Customization	legitimate	
			of the Site and	interest in the	
			Services for	processing of	
			country specifics	such personal	
			(language	data of you.	
			definition;		
			currency		
			selection, etc.).		
	<ul><li>Registration</li></ul>	<ul><li>Registration</li></ul>	<ul> <li>Prevention of</li> </ul>	-Your consent	
	on the Site;	form on the	the facts of	to the	
	and (or)	Site; and (or)	registration on	processing of	
	– Filling in	– Form in your	the Site of	your data; and	
	information	user account	persons who have	(or)	
	about		not reached the	–Fulfillment by	
	yourself in		required age for	Us to You of	
	your account.		concluding	Our obligations	
			transactions and	under the	
			for providing their	contract; and	
			personal data in	(or)	
			the absence of	– Our	Not transferred
4			the consent of an	compliance	to third parties.
Age			the consent of an adult, the age of	compliance with the	to third parties.
Age				with the	to third parties.
Age			adult, the age of	-	to third parties.
Age			adult, the age of	with the obligations that are	to third parties.
Age			adult, the age of	with the obligations that are imposed on Us	to third parties.
Age			adult, the age of	with the obligations that are imposed on Us as an operator	to third parties.
Age			adult, the age of	with the obligations that are imposed on Us as an operator by law; and	to third parties.
Age			adult, the age of	with the obligations that are imposed on Us as an operator by law; and (or)	to third parties.
Age			adult, the age of	with the obligations that are imposed on Us as an operator by law; and (or) – Our	to third parties.
Age			adult, the age of	with the obligations that are imposed on Us as an operator by law; and (or)  - Our legitimate	to third parties.
Age			adult, the age of	with the obligations that are imposed on Us as an operator by law; and (or)  Our legitimate interest in the	to third parties.
Age			adult, the age of	with the obligations that are imposed on Us as an operator by law; and (or)  Our legitimate interest in the processing of	to third parties.
Age			adult, the age of	with the obligations that are imposed on Us as an operator by law; and (or)  Our legitimate interest in the	to third parties.

	Contact	l				
2.	details					
۷.	actans					
	Phone number	-Registration on the Site; and (or) -Filling in information about yourself in your account.	- Registration form on the Site; and (or) - Form in your user account.	- Interaction with you as a user of the Site and the Services presented on it.	- Your consent to the processing of your data; and (or) - Fulfillment by Us to You of Our obligations under the contract; and (or) - Our legitimate interest in the processing of such personal data of you.	Not transferred to third parties.
	E-mail address	-Registration on the Site; and (or) - Filling in information about yourself in your account.	- Registr ation form on the Site; and (or) - Form in your user account; and (or) - IPChain ID service.	- Interaction with you as a user of the Site and the Services presented on it Sending you as a user of the Site and its Services of various kinds of notifications Providing you with the opportunity to reset and (or) recover your password to log into your account	- Your consent to the processing of your data; and / (or) -Fulfillment by Us to You of Our obligations under the contract; and (or) - Our legitimate interest in the processing of such personal data of you.	Not transferred to third parties.
3.	Information about the services you receive					
	Information about services (ordered, canceled, unpaid, as well as paid, etc.)	- "Invoices" section formed in your account	– Stripe service	- Activation by Us of the services requested and issued by You on Our Site through its Services.	- Your consent to the processing of your data; and (or) -Fulfillment by Us to You of Our obligations under the	Not transferred to third parties.

	Information about payments made by you for services that you have issued on Our Site and using its Services (amount, method, date, currency of payment; information on failed payments; information on full or partial refunds of the amounts paid; information on the refund procedure,	-"Purchases" section formed in your account.	- Stripe service	- Providing you, as a user of Our Site and its Services, with statistical data regarding the financial relationship you have with us.	contract; and (or)  Our legitimate interest in the processing of such personal data of you.  Your consent to the processing of your data; and (or)  Fulfillment by Us to You of Our obligations under the contract; and (or)  Our legitimate interest in the processing of such personal data of you	Not transferred to third parties.
	etc.) P.)					
4.	Credentials					
	Login (your email)	-Registration on the Site; and (or) -Filling in information about yourself in your account.	- Registration form on the Site; and (or) -Form in your user account.	– For internal work with the user base	- Your consent to the processing of your data; and (or) -Fulfillment by Us to You of Our obligations under the contract; and (or) - Our legitimate interest in the processing of	Not transferred to third parties.

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					such personal	
					data of you.	
	Password	-Registration on the Site; and (or) - Filling in information about yourself in your account.	- Registration form on the Site; and (or) - Form in your user account.	– For internal work with the user base	- Your consent to the processing of your data; and (or) -Fulfillment by Us to You of Our obligations under the contract; and (or) - Our legitimate interest in the processing of such personal data of you.	Not transferred to third parties.
	Date and time you created your account	- Registration on the Site.	- Registration form on the Site.	– For internal work with the user base.	- Your consent to the processing of your data; and (or) - Fulfillment by Us to You of Our obligations under the contract; and (or) - Our legitimate interest in the processing of such personal data of you.	Not transferred to third parties.
5.	Technical details				,	
	Information about your use of Our Site (time of visit; link from which the transition to the Site was made; time of stay on it; history and map of visits to the	- Each time you interact with Our Site and its Services.	– Google Analytics service	- Analytical and statistical purposes Internal (including technical and legal) goals Marketing and advertising purposes.	- Your consent to the processing of your data; and (or) - Fulfillment by Us to You of Our obligations under the contract; and (or) - Our legitimate	Not transferred to third parties.

	ation actions med on e and ne of			interest in the processing of such personal data of you.	
IP add	- Each time you interact with Our Site and its Services.	- Technical means and technologies used to determine your IP address. The IP address is basic network information, the data about which We receive from the server.	- Internal (including technical and legal) goals Marketing and advertising purposes Ensuring your safety as a user of Our Site and its Services (preventing the facts of unauthorized access to your account).	- Your consent to the processing of your data; and (or) - Fulfillment by Us to You of Our obligations under the contract; and (or) - Our compliance with the obligations that are imposed on Us as an operator by law; and (or) - Our legitimate interest in the processing of such personal data of you.	Not transferred to third parties.
Inform about time of into the accoun time of in it ar time of from it	the Services. f entry e nt, the f stay nd the f exit	- The technical means and solutions used to track your data.	- Internal (including technical and legal) goalsMarketing and advertising purposesEnsuring your safety as a user of Our Site and its Services (preventing the facts of unauthorized	- Your consent to the processing of your data; and (or) - Fulfillment by Us to You of Our obligations under the contract; and (or) - Our compliance with the obligations that are	Not transferred to third parties.

Information about the device from which the Website was logged in (including the account data): information about the operating system and platform	- Each time you interact with Our Site and its Services.	- The technical means and solutions used to track such your data (including Google Analytics, standard network stack).	access to your account).  - Internal (including technical and legal) goals Marketing and advertising purposes Ensuring your safety as a user of Our Site and its Services (preventing the facts of unauthorized access to your account).	imposed on Us as an operator by law; and (or)  Our legitimate interest in the processing of such personal data of you.  Your consent to the processing of your data; and (or)  Fulfillment by Us to You of Our obligations under the contract; and (or)  Our compliance with the obligations that are imposed on Us as an operator by law; and (or)  Our legitimate interest in the processing of such personal data of you.	Not transferred to third parties.
Information about the browser through which the Site was logged in (including the account)	- Each time you interact with Our Site and its Services.	- The technical means and solutions used to track such your data (including Google Analytics, standard network stack).	<ul> <li>Internal (in particular technical) goals.</li> <li>Marketing and advertising purposes.</li> </ul>	- Your consent to the processing of your data; and (or) - Fulfillment by Us to You of Our obligations under the contract; and (or) - Our legitimate interest in the processing of such personal data of you.	Not transferred to third parties.

	Time zone information	- Registration on the SiteSelecting the appropriate settings in your account.	- The technical means and solutions used to track such your data (in particular, the standard network stack).	- To localize the interfaces and language of the Site.	- Your consent to the processing of your data; and / (or) -Fulfillment by Us to You of Our obligations under the contract; and (or) - Our legitimate interest in the processing of such personal data of you.	Not transferred to third parties.
	Cookies	- Each time you interact with Our Site and its Services.	- The technical means and solutions used to track such your data; and (or) - Your browser.	<ul> <li>Providing by Us the mechanism of user sessions.</li> <li>Marketing and advertising purposes.</li> </ul>	- Your consent to the processing of your data; and (or) - Our legitimate interest in the processing of such personal data of you.	Not transferred to third parties.
6.	Marketing and	communication	data			
	Information about your subscriptions to Our advertising and marketing communicati ons	– Registration on the Site.	- The email address you specified during registration	-Implementation by Us of distribution of marketing and system messages.	- Your consent to the processing of your data; and (or) - Our legitimate interest in the processing of such personal data of you.	Not transferred to third parties.
	Information about your advertising and marketing preferences (including information about	- Registration on the Site.	- The email address you specified during registration	<ul> <li>Analytical and statistical purposes.</li> <li>Implementation by Us of distribution of marketing and system messages.</li> </ul>	<ul> <li>Your consent</li> <li>to the</li> <li>processing of</li> <li>your data; and</li> <li>(or)</li> <li>Our</li> <li>legitimate</li> <li>interest in the</li> </ul>	Not transferred to third parties.

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#### 9. HOW DO WE PROCESS (USE) AND DISCLOSE YOUR PERSONAL DATA?

9.1. The processing (use) of your personal data is any action performed with your personal data. Such actions, among others, may include actions for: collection (receipt); recording; organizations; structuring; storage; adaptation or change (processing, modification); search or selection; use; disclosure by transfer, distribution, provision of access or in any other way: grouping or combination; restriction (blocking) or destruction (deletion) of your personal data.

At the same time, We do not process (use) your personal data for commercial purposes. This literally means the following: We do not sell, rent or lease your personal data to other organizations or third parties for cash or other equivalent counter provision.

- 9.2. In some cases, regulated in this Policy, We may provide your personal data to third parties for the following purposes:
  - To assist in providing the Services and providing you with the services you have requested and the subscriptions you make (see, for example, Section 8 of this Policy);
  - To carry out direct business activities by Us (for example, when transferring Your data to Our related companies in the general business interests);
  - For the purposes of exercising Our rights and legitimate interests related to the development of Our business (for example, We may sell, buy, merge and enter into partnerships with other companies and enterprises, or partially or completely sell our assets. In the framework of such transactions, information about you as a user of Our Site and its Services may be included in the number of transferred assets);
  - For the purpose of complying with the requirements of the law or the orders of the relevant regulatory, supervisory, law enforcement and (or) judicial authorities (for example, when the disclosure of your personal data is necessary to investigate, prevent or take action against potential illegal actions; suspicion of fraud; situations that suggest a potential threat to violate the rights of third and (or) Our rights, legitimate interests and Our property as an organization, the rights and legitimate interests of Our employees, as well as the rights and legitimate interests of other users of Our Site and its Services; situations involving a potential threat to the physical safety of a person, violations of this Policy and the Rules for using Our Site and its Services;
  - For other purposes and in other cases when We have your consent for this and (or) other legal grounds that allow and (or) require us to disclose your personal data in the absence of your consent.

#### 10. HOW AND WHERE DO WE STORE YOUR PERSONAL DATA?

10.1. We are an organization incorporated in the territory and under the laws of the United Kingdom of Great Britain and Northern Ireland (registration number: 12098110. Therefore, Our main offices are located in the United Kingdom.

## 10.2. If you are:

- 1. A national of the United Kingdom of Great Britain and Northern Ireland and (or) are on its immediate territory; and (or)
- 2. Citizen of any member state of the European Union and (or) stay on the territory of any member state of the European Union; and (or)
- 3. A citizen of any country that is not a member of the European Union, and (or) are located on the territory of any country that is not a member of the European Union, except for the case when

you are a citizen of the Russian Federation and visit Our Site and (or) use its Services directly from on the territory of the Russian Federation

We will store your personal data in data centers located on the territories of the following states: Netherlands.

10.3. If you are a citizen of the Russian Federation and visit Our Site and (or) use the Services presented on it directly from the territory of the Russian Federation - We, due to the requirements of Russian legislation on personal data in terms of localization of personal data of Russian citizens, will store your personal data directly on the territory of the Russian Federation.

Obligations to directly ensure the storage and processing (use) of your personal data on the territory of the Russian Federation are assigned to the following legal entity established on the territory and under the legislation of the Russian Federation:

Name of the legal entity	Legal entity details	Legal entity contacts
	PRSN:	Phone:
	ITN/TIN:	Fax:
	Legal address	Mailing address:
	Actual address:	Email:

#### 11. HOW LONG DO WE STORE YOUR PERSONAL DATA?

- 11.1. We will only store your personal data for as long as it is necessary to fulfill the purposes for which We collected it; as well as for the purpose of meeting any regulatory, accounting and reporting requirements; performing legal work or legal defense.
- 11.2. To determine the appropriate storage period for personal data, We take into account the volume, nature and sensitivity of personal data, the potential risk of harm as a result of their unauthorized use or disclosure; as well as the purposes for which We process (use) your personal data.

In addition, We also take into account that We have the ability to achieve the relevant goals of collection and processing (use) of your personal data by other means that do not require the collection and processing (use) of such your personal data; as well as applicable legal requirements.

- 11.3. For more information on the storage times for cookies, see Section 13 of this Policy.
- 11.4. If you would like to know more about the retention periods that We apply to your personal data, please contact Our Data Protection Officer in any of the following ways:

# CONTACTS OF THE INSPECTOR FOR THE PROTECTION OF PERSONAL DATA IN THE TERRITORY OF THE GREAT BRITAIN AND OTHER COUNTRIES

Postal address: 12 Mulberry Place, Pinnell Road, London, England, SE9 6AR

**Email address:** alex.blyumin@algo.id **Phone number:** +442045770253

11.5. In some cases, We may anonymize your personal data (so that they can no longer be associated with you) for research or statistical purposes. In this case, We can use such data indefinitely without your further notice.

#### 12. WHAT RIGHTS DO YOU HAVE REGARDING YOUR PERSONAL DATA?

In accordance with the legislation on the protection of personal data, you have a number of rights related to your personal data, which We are obliged to communicate to you. We respect your rights and guarantee their strict observance. Depending on the basis for the processing (use) of your personal data, the following rights may be available to you:

Nº	Your rights	What you can demand
1.	Be informed about the processing (use) of your personal data	Until the moment you provide any of your personal data to Us, you have the right to receive timely information from Us about:  - Who We are;  - How We collect, store, process (use), transfer and protect your personal data.  Relevant information about this should be provided in an easily accessible format and presented in a concise and understandable form in a simple and understandable language.
2.	You have the right to contact Us with a demand to prove Confirmation that We do or do not collect, process (unyour personal data; and (or)  A copy of all personal data that We have and the process and storage of which We carry out; and (or)  Information about:  What kind of your personal data we have;  Where did We receive your personal data;  How and why We process (use) your personal data;  To whom and why We transfer your personal data and you can read more detailed information about the contour right here:  https://ico.org.uk/your-data-matters/your-right-to-get-data/	
3.	To correct inaccurate personal data	You have the right to contact Us with a request:  - Correct (change, replace) or delete the information about you that you consider inaccurate or irrelevant;  - Supplement the information we have about you with information, in the absence of which such information about you appears to you incomplete. A more detailed description of this right can be found here:  https://ico.org.uk/your-data-matters/your-right-to-get-your-data-cor rected/
4.	To delete (destroy) your personal data	You have the right to contact Us with a request to delete (destroy) your personal data in the following cases:  - We no longer need your personal data to achieve the purposes for which they were originally collected by Us or processed (used) by Us; and (or)

		<ul> <li>you have revoked your earlier consent to the processing (use) of your personal data; and (or)</li> <li>You object to the processing (use) of your personal data, and your legitimate interests outweigh Our legitimate interests, on the basis of which We process (use) your personal data; and (or)</li> <li>You object to the processing (use) of your personal data for the purpose of making direct contacts with you.</li> <li>We process (use) your personal data unlawfully; and (or)</li> <li>We have a statutory obligation to delete (destroy) your personal data; and (or)</li> <li>Your personal data was collected from you when you were a child for the purpose of providing you with online services. You can get more detailed information about the content and how you exercise this right by clicking on the following link: <a href="http://ico.org.uk/your-data-matters/your-right-to-get-your-data-deleted/">http://ico.org.uk/your-data-matters/your-right-to-get-your-data-deleted/</a></li> </ul>
5.	To restrict (block) your personal data	You have the right to contact Us with a request:  Temporarily restrict the processing (use) of your personal data when:  You consider your personal data processed by Us inaccurate or  you object to the processing (use) of your personal data by Us;  Suspend the process of deleting your personal data when:  you believe that We are processing (using) your personal data unlawfully, but do not want such data to be deleted; or  You believe that We no longer need to process (use) your personal data, but you want Us to store it for the purposes of creating, exercising or defending legal claims.  A more detailed description of this right can be found here: https://ico.org.uk/your-data-matters/your-right-to-limit-how-organis ations-use-your-data/
6.	To object to the processing (use) of your personal data	In certain cases, you have the right to send Us your objection to the use of your personal data. This literally means that you have the right to demand from Us to stop processing (use) your personal data for one or more of the following purposes:  - To achieve socially significant goals; and (or)  - To exercise the official powers assigned to Us; and (or)  - To pursue Our legitimate interests; and (or)  - For scientific or historical research or for statistical purposes; and (or)  - To have direct contact with you.  You can get more detailed information on the content and how you exercise this right by clicking on the following link:  https://ico.org.uk/your-data-matters/the-right-to-object-to-the-use-of-your-data/
7.	The transfer of your personal data	You have the right to contact Us with a request:  - Provide you in an accessible and machine-readable format (for example, in the form of a CSV file) your personal data that you personally provided to Us or that were collected by Us in the process of monitoring your activity when using Our website; and (or)

-Transfer your personal data that you personally provided to Us or that was collected by Us in the process of monitoring your activity while using our website to another company specified by you, provided that such transfer is technically possible.
A more detailed description of this right can be found here: https://ico.org.uk/your-data-matters/your-right-to-data-portability/

To exercise any of the above your rights, you can apply with a corresponding request to Our Inspector for the Protection of Personal Data in one of the following ways:

# CONTACTS OF THE INSPECTOR FOR THE PROTECTION OF PERSONAL DATA IN THE TERRITORY OF THE GREAT BRITAIN AND OTHER COUNTRIES

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**Email address:** alex.blyumin@algo.id **Phone number:** +442045770253

We do not charge you any fee for providing you with access to your personal data (or for exercising any of your rights). If your request turns out to be unfounded, repetitive or redundant, We will be entitled to:

- Demand from you the payment of administrative costs associated with the execution of such your request; or
- To deny you the satisfaction of the requirements stated by you in such a request.

To ensure the exercise of your right to access your personal data (or the exercise of any of your other rights), We may need additional information from you that will allow Us to identify you. This action on Our part is one of the security measures that We take, which allows Us to make sure that We do not disclose your personal data to anyone who is not entitled to receive it. In addition, We may also contact you and ask you to provide Us with additional information regarding your request in order to expedite the process of responding to it.

We will do our best to respond to all your legitimate requests within 1 (one) calendar month from the date of the request and your identification. If your request turns out to be particularly difficult or you make several requests, We may need more than 1 (one) calendar month to give you an answer. If this happens, We will definitely notify you about this, indicating the reason and the amount of the additional period that We need.

## 13. WHAT ARE COOKIES AND HOW DO WE COLLECT AND PROCESS (USE) THEM?

Cookies are small text files containing a small amount of information and downloaded to the device you are using when you visit Our Site. Once downloaded to your technical device, the Cookies are sent back to Our Site each time you visit it, or to another site, if such a site recognizes such Cookies. Usually, Cookies are widely used to ensure the operation of the Sites or to improve the performance of the Site; as well as to provide Us, as owners of the Site, with relevant information.

In the table below, We explain exactly what types of Cookies We collect and why:

The name of the cookie or the name of the resource to which the cookie belongs	Cookie type	Purpose of collecting the cookie	Cookie retention period
algo.id	Session, permanent, cannot be disabled	For the operability of the user's personal account	1 Year
Google Analytics	Permanent, can be disabled	Analysis of visits and user behavior	According to Google regulations
IPChain ID	Session	For authentication	According to IPChain ID Global regulations

### 14. LEGAL CONSEQUENCES OF YOUR PROVIDING OR NOT PROVIDING YOUR PERSONAL DATA TO US

14.1. By registering on Our Site and (or) using it and (or) the Services presented on it, you are aware of the fact that you provide Us with your personal data (included in one or another category specified in Section 8 of this Policy).

In addition, you acknowledge and confirm for Us the legality of processing (use) of this kind of your personal data (including without obtaining your consent), due to other legal grounds for their processing (in particular, the fulfillment by Us of our contractual obligations to you; compliance by Us obligations that are assigned to Us as an operator by law; our legitimate interest in the processing of your personal data), for the purposes specified in this Policy.

- 14.2. If we need to use your personal data for other purposes not related to the purposes presented in this Policy, We guarantee you that such processing (use) will be carried out only with your explicit consent or if we have other legal grounds for their processing, and solely in accordance with the provisions of this Policy.
- 14.3. If you, for any reason and at any stage of interaction with Us, visit and (or) use Our Site and the Services presented on it, refuse to provide Us with any of your personal data (included in one or another category specified in Section 8 of this Policy), a situation may arise in which We will not be able to provide you with the opportunity to use Our Site and (or) the Services presented on it in full due to the lack of necessary and sufficient information about You from Us.

# 14.4. If, after reading this Policy:

You do not understand some of its provisions, you can contact Us in any way convenient for you from the following:

# CONTACTS OF THE INSPECTOR FOR THE PROTECTION OF PERSONAL DATA IN THE TERRITORY OF THE GREAT BRITAIN AND OTHER COUNTRIES

Postal address: 12 Mulberry Place, Pinnell Road, London, England, SE9 6AR

**Email address:** alex.blyumin@algo.id **Phone number:** +442045770253

- You disagree in part or in full with this Privacy Policy, as well as you do not want to provide any of your personal data, thereby not only expressing your refusal to provide Us with your consent to the processing of personal data, but also your unwillingness for Us to process any of your personal data on grounds that do not require your consent, you need to leave Our Site without performing any actions on it (including actions to register on the Site, using the Services presented on Our Site, etc. .).
- 14.5. If, after reading this Privacy Policy, you continue to visit Our Site and (or) use it and the Services provided on it, Based on the principle of good faith, We have the right to consider such Your actions (and in the absence of any other actions on your part indicating the opposite) as your confirmation of the fact that:
  - You have read this Policy in good faith and in a timely manner (that is, before using Our Site and the Services presented on it); and
  - All provisions of this Policy are clear to you and are not disputed by you in whole or in part; and
  - You acknowledge all provisions of this Policy to be legally binding on you.

#### 15. WHO TO CONTACT IF YOU HAVE A COMPLAINT?

15.1. We sincerely hope that if you have any problems or complaints related to the processing (use) of your personal data by Us, you will first contact Us, since We are aimed at prompt, effective and safe resolution of any with the processing (use) of your personal data of problems and complaints. We kindly remind you that you can contact Our Inspector for the Protection of Personal Data in any way convenient for you from among the following:

# CONTACTS OF THE INSPECTOR FOR THE PROTECTION OF PERSONAL DATA IN THE TERRITORY OF THE GREAT BRITAIN AND OTHER COUNTRIES

**Postal address:** 12 Mulberry Place, Pinnell Road, London, England, SE9 6AR

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15.2. If, for some reason, you do not want to contact Us, or you have contacted, but were not satisfied with the solution proposed by Us, you can contact your national data protection authority directly with the relevant problem or complaint.

In the UK, this body is the Office of the Information Commissioner. You can send your problem or complaint to the Office of the Information Commissioner by clicking on the following link: <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a>.

In addition, you can contact the Office of the Information Commissioner at the following contacts.

Address: Information Commissioner's Office

Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

**Phone number:** 0303 123 1113 **Fax:** 01625 524510