

PERSONAL DATA PROCESSING POLICY (PRIVACY POLICY)

This Personal Data Processing Policy (hereinafter referred to as the “Privacy Policy”) is prepared by the Administrator in accordance with the provisions and requirements of the current laws of the Russian Federation. The Privacy Policy is aimed at making people aware of the conditions of how we collect, process, use, protect Privacy Policy and transfer the personal information you (Users) provide or collect through our website, and on how we provide such information to third parties.

This Privacy Policy is a legally binding document for Users using the Mobile App in accordance with its main intended purpose. Each User is required to read this Privacy Policy before using the Mobile App.

This Privacy Policy shall be deemed accepted by the User if:

- The User starts using the Mobile App (its technical features and functionality);

Accepting the Privacy Policy means that the User has read and understood all the terms of the Privacy Policy collectively and separately and that the User fully, unconditionally and unreservedly accept the terms and conditions contained in the Privacy Policy.

The Administrator and the User are hereinafter referred to collectively as - “Parties”, and separately as “Party”.

1. TERMS USED IN THE PRIVACY POLICY

1.1. For the purposes of this Privacy Policy, the following terms are used with the following meaning:

1.1.1. Mobile App (or Mobile Application) – mobile application “Hodokee”, which is a software designed to be used on mobile devices, such as mobile (cell) phones, tablets, etc., so that the User could receive the various features described in the text of this Privacy Policy.

1.1.2. Administrator – a person legally authorised to own and use the Mobile App and make it available for use by Users under the conditions stipulated in this Privacy Policy.

1.1.3. User – any individual who has reached the age of 13 (thirteen) years and who uses the Mobile App in accordance with its main intended purpose.

1.1.4. User Information – any information about the User or relating to the User.

1.2. Should there be no unambiguous interpretation of a term in the text of this Privacy Policy, such term shall be interpreted first of all as defined in the Mobile App, and then in accordance with the statutory provisions of the Russian Federation.

2. PRIVACY POLICY PURPOSE

2.1. This Privacy Policy is intended at ensuring proper protection of User Information (including their personal data) against unauthorized access by third parties and to define the procedure for receiving, submitting and using User Information.

2.2. This Privacy Policy aims at defining exclusively general provisions on receipt and use of User Information. Separate features of receiving and using User Information may be established by other documents posted in the Mobile App, or may be determined by the functionality of the Mobile App.

3. PERSONAL DATA OF USERS

3.1. Only the Administrator can create the list of User Information to be provided by the User and placed in the Mobile App. In particular, but not limited to the above, the Administrator may collect, systematize and store the following User Information: pseudonym (nickname), phone number, number of steps, profession, interests, favourite food, weight, height, age, etc.

3.2. The User agrees to place his personal data in the Mobile App in order to enable the Administrator make the Mobile App accessible for use by the User.

3.3. The use of User Information for any purposes other than those relevant to the subject of the Mobile App is prohibited.

3.4. The User may delete User Information hosted on the Mobile App server. To do this, the User must press the special button “Delete account” in the Mobile App. After clicking the specified button, any User Information is automatically deleted from the Mobile App server. By using the Mobile App, the User agrees and accepts that the Administrator reserves the right to use his personal data anonymously and in a generalized form for statistical purposes.

3.5. The Administrator shall not provide any personal information about Users to private individuals and organizations that declare use of such information for other purposes – unauthorized advertising, spam, providing information to other persons, etc.

3.6. The Administrator is not liable for possible inappropriate use of information contained in the Mobile App by Users or other persons without them notifying the Administrator with or without a breach of the information security of the Mobile App.

3.7. Users' personal data is processed using firmware, software and hardware of the Mobile App.

4. INFORMATION SOURCES

4.1. The Administrator receives User Information in the following ways (from the following sources):

4.1.1. User Information provided directly by Users themselves, including but not limited to:

- User Information posted by the User in the Mobile App;
- User Information received from another User;
- User Information provided at the Administrator's request.

4.1.1.1. The Administrator may, at his own discretion, request or ask the User for any User Information that might be needed by the Administrator to meet his obligations to Users. In this case, the User is obligated to provide only accurate, complete and current User Information.

4.1.2. Information obtained from software, technical and hardware services (software, etc.) used by the User when using the Mobile App, including but not limited to the following:

- Information about software and hardware devices used by Users when using the Mobile App, including the model and version of the operating system, unique device identifiers, as well as information about the mobile network and phone number from where the User uses the Mobile App;

- Information recorded in server logs, in particular, information about Users' search queries, cookies, IP address, system malfunctions, cookie data, pages of Mobile App pages viewed by the User;

- Information on where the User is located, provided via the Internet, etc.;

- Information on the domain name of the User's provider, the provider's country of location, etc.

4.1.3. User Information obtained from the service "Game Center", such as pseudonym, phone number, etc.

5. NOTIFICATIONS AND REPRESENTATIONS

5.1. The User hereby acknowledges and agrees that placement of information by him in the Mobile App, as well as transfer of information to the Administrator, including his personal data is done independently, voluntarily and at his own discretion. By placing his personal data in the Mobile App, the User confirms that he does this voluntarily, and that he voluntarily provides the data to the Administrator for processing.

5.2. The User hereby consents to the processing of his personal data in accordance with the provisions of the current laws of the Russian Federation. The Administrator may use the User's personal data for the purposes of meeting his obligations to the User, including those specified in Section 3 hereof, in accordance with the provisions of the current law on personal data.

5.3. The User hereby consents to receive from the Administrator various bulk SMS messages, e-mail messages and other forms of information, including those containing ads.

5.4. The Administrator does not verify the accuracy of User Information provided or received from Users. The Administrator does not exercise control over the legal capacity of Users. It is presumed and the Administrator assumes that in all cases, without exception, the User provides complete and accurate information about himself and keeps this information up to date.

5.5. When processing Users' personal data, the Administrator undertakes to take all organizational and technical measures to protect such data against unauthorized access. However, it is possible that as a result of malfunction of the Mobile App, a virus or hacker attack, technical faults and other events, the security of Users' personal data may be compromised.

5.6. The Administrator undertakes not to place personal data of other persons in the Mobile App. The Administrator also undertakes not to use the personal data of other Users in any way that runs contrary to the laws of the Russian Federation for illegal or unlawful purposes, for extracting benefits and for any other purposes that do not answer the purposes of the Mobile App.

6. TRANSFER OF USER INFORMATION

6.1. The Administrator transfers User Information to third-party services in an anonymised form, in particular, but not limited to information specified in advertising service Google, weather service OpenWeatherMap, etc. The User hereby consents to the transfer of his User Information to third-party services.

6.2. The Administrator may, without the User's consent and without the User's prior notice, transfer User Information in the following cases:

- If government bodies, including law enforcement agencies, inquiry and investigative agencies, the court and local governments send a motivated request for such User Information to be provided to them;
- If a court order demands that such User Information be provided to third parties;
- If third parties and public organizations send a motivated request in cases of violation or alleged violation of their rights;
- In other cases provided for by the current laws of the Russian Federation.

7. DISPUTE RESOLUTION

7.1. The Administrator and the User have hereby agreed to try and resolve any disputes and disagreements arising from this Privacy Policy through negotiations. The deadline for responding to a submitted claim is 10 (ten) business days from the date the claim is received.

7.2. In cases where the Parties are unable to reach agreement on a dispute arising from this Privacy Policy, such dispute shall be subject to judicial review in accordance with the laws

applicable at the location of the Administrator.

8. DURATION

8.1. This Privacy Policy comes into force on the date it is placed in the Mobile App.

8.2. This Privacy Policy is placed for an indefinite period and becomes void once the Administrator cancels it.

8.3. Whenever amendments to the Privacy Policy are made, such changes shall take effect from the moment of publication of the new version of the Privacy Policy, unless a different date for entry into force of the amendments is determined further upon publication. The Administrator may unilaterally make changes to the text of the Privacy Policy.

8.4. The User undertakes to independently monitor changes in the text of this Privacy Policy. Here, the User is liable for any negative consequence associated with failure to meet this obligation.

8.5. If the User disagrees with the corresponding changes, he shall stop using the Services of the Mobile App and refuse the proposed resources. Continued use of Services of the Mobile App means that the User agrees to the terms of the newly amended Privacy Policy.

8.6. The current version of the Privacy Policy is publicly available for users to read.

8.7. This Privacy Policy has been drafted in Russian and translated into other languages. In the event of any discrepancies between the version of the Privacy Policy drawn up in Russian and the version of the Privacy Policy translated into another language, the provisions of the Russian version shall prevail.