

# PRST PRIVACY POLICY

Effective Date: July 16, 2020

This Privacy Policy establishes the obligations of the Application owner (Andrei Bahachenka) on non-disclosure and ensuring the protection of the confidentiality of the personal data that you provide. We are committed ourselves to protecting and respecting your rights to protect your personal data. One of the principles of our work with personal data is the integrity of your personal information. We undertake to ensure the keeping your confidential information in secret, to prevent its disclosure without your prior written permission, and not to sell, exchange, publish or disclose in any other possible way, unless we are obliged to do so by virtue of an act of law.

This Policy is designed to inform you how we collect, uses and protects information obtained from you through PRST which is owned or controlled by Andrei Bahachenka.

Andrei Bahachenka is a citizen of the Republic of Belarus, address: Prospekt Pobediteley 129/30, Minsk, The Republic of Belarus.

We use your personal data only for the purposes specified in this document. Please read this Privacy Policy before using our application.

## DEFINITIONS

“PRST” is mobile application developed and owned by Andrei Bahachenka which is published at mobile application stores.

“Application user” (“user”, “you”) is a natural person or a representative of a legal entity, which has full legal capacity and ability to use PRST in accordance with the Terms of Services of it.

“Personal data” (“personal information”) – any information concerning an identified or identifiable natural person. Personal data which have undergone pseudonymization, which could be attributed to a natural person by the use of additional information should be considered to be information on an identifiable natural person. Anonymous information that cannot associate with your person is not included in category of “personal data”.

“Personal data processing” is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

“Child” (“children”) is an individual under the age of 16 (or another minimum legal age to allow consent for data collection and processing, if applicable legislation provides for a different age).

## POLICY SCOPE

This Privacy Policy applies to any information collected or sent via PRST and which refer to this Privacy Policy.

We do not collect or process special categories of personal data relating to racial or ethnic origin, political opinions, religion or philosophical beliefs, trade union membership, and the processing of genetic data, data concerning health or data concerning sex life or criminal convictions and offences or related security measures.

We recognize that there are special obligations to protect children's personal data. We do not knowingly collect personal information from children under the age of 16 without the consent of the child's parent or legal guardian. Our services are not intended for persons under the age of 16. If it come to our attention that a child under the age of 16 has provided us with personal data without the consent of his or her parent or legal guardian, we will take all measures available to remove this personal data. If you know that a child has provided us with personal data, please contact us through our support service at [andreibahachenka@gmail.com](mailto:andreibahachenka@gmail.com).

## **LEGAL BASIS FOR PERSONAL DATA PROCESSING**

We collect and process information about you only in cases where we have the legal basis for it accordance with applicable law. We collect and use your information only where:

- you have given consent to the processing of your personal data for one or more specific purposes;
- processing is necessary for the performance of a contract with you or in order to entering into a contract with you;
- processing is necessary for compliance with our legal obligation.

## **USER CONSENT FOR PERSONAL DATA PROCESSING**

You are informed and agree that your consent, given in electronic form while using PRST, is a consent that fully complies with the requirements of the legislation on personal data and confirm the fact of its receipt by us. By using PRST you accept this Privacy Policy. If you do not agree to the terms of this Privacy Policy, do not open or use PRST.

## **PERSONAL DATA WE PROCESS**

There are two major groups of personal data that we process.

The first group of personal data that we process includes the personal data that we may automatically collect. We may collect and analyze device information and identifiers such as IP addresses, location information (by country and city), unique device identifiers, Apple ID for advertising, statistical information about the use of the PRST, error logs, and other similar information.

The second group of personal data that we process includes the personal data that you voluntary provide us with for the purpose of taking feedback from our support team. When we ask you to provide personal data, you can opt out. Such personal data may include: the contact phone number of the User; email address (e-mail); link to a server of your company.

We do not use our (first-party) cookies. Mobile devices may use other tracking files which are similar to cookies (for example iOS devices use Apple's Advertising Identifier and Identifier For Vendor).

In the case of providing data, it is implied that you provide us with accurate information about yourself. We are not required to verify the accuracy of the information provided.

We ask you not to provide information relating to racial or ethnic origin, political opinions, religion or philosophical beliefs, trade union membership, and the processing of genetic data, data concerning health or data concerning sex life or criminal convictions and offences or related security measures when using our application. In case you provide such information for any reason, it will be your direct consent to our processing such information.

Notwithstanding that any personal information that you provide will be protected by this Privacy Policy, except for the cases when we have a legal obligation to disclose it.

## **PURPOSES OF PROCESSING PERSONAL DATA**

We process information to provide better services to its users. We may process your personal data only for following purposes:

- to develop PRST for user's comfort;
- to communicate with you, including sending notifications, requests and information regarding the use of PRST;
- to conduct statistical and other studies based on anonymous data;
- any other purpose for which you provided information to us.

## **GENERAL TERMS OF PERSONAL DATA PROCESSING**

The information you provide will be used by us in accordance with this Privacy Policy.

We store personal data you provided us with as long as it is necessary for the defined in these Privacy Policy purposes of processing your personal data. The processing of personal data is carried out without time limit.

Your personal data may be disclosed for the state authorities only in accordance with a law applicable.

We will stop processing your personal data:

- upon reaching the purposes of processing or in case of loss of the need to achieve these purposes;
- upon your request, if the personal data processed is illegally obtained or is not necessary for the stated purposes of processing;
- upon expiration of your consent to the processing of personal data or in the case of withdrawal of such consent, unless there are other legal grounds for the processing of personal data.

## **SECURITY**

We protect your personal information in the same way that it protects its own confidential information, i.e. we store it on secure servers that only selected our personnel have access to prevent unauthorized access. We comply with recognized international standards. We understand the need to protect user privacy and take all available to us security measures to protect your data from loss, misuse and unauthorized access, disclosure, alteration and destruction.

## **YOUR LEGAL RIGHTS IN RELATION TO PERSONAL DATA**

You have the following rights in relation to your personal data:

**To access your personal data.** You have the right to access your personal data that we stored by sending a request to our e-mail: [andreibahachenka@gmail.com](mailto:andreibahachenka@gmail.com). Under certain circumstances and in accordance with applicable law, you have the right to receive a copy of your personal data that you provided to us, in a structured, widely used and machine-readable format.

You will not have to pay for access to your personal information (or to exercise any other rights). Notwithstanding that we may charge a reasonable fee or refuse to comply with your request if your request is manifestly unreasonable or repetitive.

**To modify or corrected your personal data.** You have the right to send us a request to change your personal data, if, for example, it is incomplete or incorrect. To modify your personal data, you can send a request by e-mail: [andreibahachenka@gmail.com](mailto:andreibahachenka@gmail.com).

**To withdraw your consent.** In cases where we process your personal data based on your consent, you can withdraw your consent at any time. In order to withdraw your consent to the processing of your personal data, you need to send a request to our e-mail: [andreibahachenka@gmail.com](mailto:andreibahachenka@gmail.com). The withdrawal of your consent will not affect the legality of any processing of us conducted prior to your withdrawal, nor will it affect the processing of your personal information where we have the legal right or obligation to do so by virtue of an act of law.

**To restrict or prohibit the processing of your personal data.** You have the right to restrict or prohibit the processing of personal data at any time, for justified reasons.

Upon receipt of the request, we will stop or limit the processing of your personal data, except in situations where we have legal grounds or legal obligation for the processing of personal data, as well as if such processing is necessary to establish, exercise or protect our rights.

**Other rights.** Along with the rights to access, modify, restrict or prohibit the processing mentioned above, you have other rights in relation to the personal data we store, such as the right to delete data, the right to transfer data, the right to file a complaint to the data protection authority.

If you have any questions or you want to exercise your rights, please contact us by email [andreibahachenka@gmail.com](mailto:andreibahachenka@gmail.com). We will do its best to respond to your reasonable request within 30 days. Sometimes it may take longer if your request is particularly complex or you have made several requests. In this case, we will notify you and will keep you informed.

### **COMPLAINTS CONSIDERATION PROCEDURE**

We hope you don't need it, but if you want to file a complaint about our use of your personal data, please, send an email with detailed information about your complaint to [andreibahachenka@gmail.com](mailto:andreibahachenka@gmail.com). Any complaints received will be reviewed and respond within 30 days. You also have the right to file a complaint to authorized body.

### **POLICY CHANGES**

This version was last updated on July 16, 2020. We will occasionally update this privacy notice to reflect changes in our practices and services. Therefore, we encourage you to review this privacy statement periodically to be informed about how we are protecting your information. A new Privacy Policy takes effect from the moment it is posted, unless otherwise provided by the new edition of the Privacy Policy. By continuing to use our application after changing the Policy, you agree to the changes made in this Privacy Policy.

### **CONTACTS**

If you have any questions or suggestions regarding this Policy or you would like to contact us with a request or complaint regarding the processing of your personal data, please, contact us by email: [andreibahachenka@gmail.com](mailto:andreibahachenka@gmail.com), by phone: +375447410819 or by mail: Prospekt Pobediteley 129/30, Minsk, The Republic of Belarus, 220062.