

INTRODUCTION

This is the privacy policy of Simple Solutions LLC (“we”, “us” or “our”).

This privacy policy will inform you how we look after your personal data when you visit our websites, contact us, subscribe to our newsletter and/or install or use our GTO Sensei mobile app (“App”).

This privacy policy is provided in a layered format so you can click through to the specific areas set out below.

1. GLOSSARY

When we refer to data protection legislation we mean the General Data Protection Regulation (Regulation (EU) 2016/679) (“GDPR”) and the Data Protection Act 2018.

A controller is someone who decides why personal information is to be collected and how it will be used and treated.

Personal information / data is information that can be used to identify or contact a specific individual, such as a name, address, telephone number, email address, etc., and also online identifiers and location data such as IP addresses and mobile device IDs.

2. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information on how we collect and use your personal data through your use of our websites, when you contact us, subscribe to our newsletter and when you install or use the App.

Our websites and the App are not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements our other notices and privacy policies and is not intended to override them.

ABOUT US AND CONTACT DETAILS

We are the controller in respect of personal data collected from our websites and the App.

If you have any questions about this privacy policy or our privacy practices, please contact us in the following ways:

Simple Solutions LTD

Email address: info@simplesolutions.ai

Postal address: 105064, Russia, Moscow, Nizhniy Susalnyy pereulok, 5 building 15

CHANGES TO OUR PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review (most recent update: 13 August 2020). Every time you wish to use our websites, please check this privacy policy. If you have installed our App or created a user account, we notify updates to you by email or when you next start the App or log onto your user account. The new policy may be displayed on-screen and you may be required to read and accept the changes to proceed.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

Our websites and the App may include links to our partners, third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies. Please check these policies before you submit any personal data to these websites or use these services.

3. TYPE OF INFORMATION WE COLLECT

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes name, username, date of birth, gender.
- Contact Data includes address, email address and telephone number.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- Profile Data includes your username and password, details about your subscriptions.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Financial Data includes bank account and payment card details.
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving direct marketing from us.
- Device Data includes information about the device you use.
- Content Data includes content you generate through your use of the App such as your results.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data

will not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific App feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. We ask you not to provide any such information to us.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we are about to enter into with you, and you fail to provide that data when requested, we may not be able to enter into the contract with you or perform that contract. For example, we require certain personal data from you before you can register to use the App.

4. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us personal data including your Identity, Profile, Transaction, Financial and Contact Data by filling in forms or by corresponding with us by email or otherwise and when you subscribe to our mailing list. This includes personal data you provide when you:

- install the App
- create a user account
- make in-App purchases
- subscribe to our newsletter
- give us feedback or contact us
- share data within the App's social media functions
- report a problem within the App or our websites.
- Automated technologies or interactions. As you interact with our websites or our App, we will automatically collect personal data including Technical/Device and Usage Data about you. We collect this personal data by using cookies, server logs and other similar technologies. Please see our Website Terms and Conditions for further details.
- Location Data. We use also GPS technology to determine your current location. Some of our location-enabled services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by disabling Location Data in your settings.
- Third parties. We will receive personal data about you from various third parties as set out below:
 - Google Analytics
Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to

track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

- Google AdWords

Google AdWords remarketing service is provided by Google Inc. Simple Solutions LTD uses remarketing services to advertise on third party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimize and serve ads based on your past visits to our Service. You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page:

<http://www.google.com/settings/ads> Google also recommends

installing the Google Analytics Opt-out Browser Add-on –

<https://tools.google.com/dlpage/gaoptout> – for your web browser.

Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

- Facebook Facebook remarketing service is provided by Facebook Inc. You can learn more about interest-based advertising from Facebook by visiting this page:

<https://www.facebook.com/help/164968693837950> To opt-out from

Facebook's interest-based ads follow these instructions from

Facebook:

<https://www.facebook.com/help/568137493302217> Facebook adheres to the Self-Regulatory Principles for Online Behavioral Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA <http://www.aboutads.info/choices/>, the Digital Advertising Alliance of Canada in Canada <http://youradchoices.ca/> or the European Interactive Digital Advertising Alliance in Europe <http://www.youronlinechoices.eu/>, or opt-out using your mobile device settings. For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>

- YouTubeOur website uses embedded videos provided by YouTube which is operated by YouTube LLC, 901 Cherry Avenue, San Bruno, CA 94066, USA, and is represented by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. In general, your IP address is automatically sent to YouTube when you access pages with embedded videos and cookies are installed. When you click on a video, your IP address is likewise sent to YouTube and YouTube receives information about the video you have watched. If you are logged onto YouTube as a member, then YouTube will automatically assign this information to your YouTube user account (you can avoid this by first logging out of your YouTube account before clicking on the video). We have no knowledge of the possible types of personal data collected or used by YouTube and therefore, have no influence over this. You can find more information about YouTube's data protection policy under: [Google Privacy Policy](#)
- Unique application numbers. When you want to install or uninstall an App containing a unique application number or when such App searches for automatic updates, that number and information about

your installation, for example, the type of operating system, may be sent to us.

COOKIES

We use cookies on our websites. For detailed information on the cookies we use, the purposes for which we use them and how you can exercise your choices regarding our use of your cookies, see our Website Terms and Conditions. If you disable or refuse cookies, please note that some parts of our websites may become inaccessible or not function properly.

5. HOW WE USE YOUR PERSONAL DATA?

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.
- Where you have consented to the processing. You have the right to withdraw consent at any time.

6. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

| Purpose/Activity | Type of data may include: | Lawful basis for processing including basis of legitimate interest |
|--|---|--|
| To administer and protect our business, App and websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | (a) Identity (b) Contact (c) Technical/D evice | (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation |

| | | |
|--|----------------------------------|---|
| To use data analytics to improve our website, App, services, marketing, customer relationships and experiences | (a) Technical / Device (b) Usage | Necessary for our legitimate interests (to define types of customers for our services, to keep our websites and App updated and relevant, to develop our business and to inform our marketing strategy) |
|--|----------------------------------|---|

| | | |
|-------------------------------------|--|---|
| To respond to your query / feedback | (a) Identity (b) Contact (c) Profile (d) Financial (e) Transaction | (a) Necessary for our legitimate interests (assisting out subscribers and website users; maintaining a relationship with you and improving our websites, App and services) (b) Performance of a contract with you |
|-------------------------------------|--|---|

| | | |
|--|---|---|
| To install the App and to create your user account | (a) Identity (b) Contact (c) Technical/Device (e) Profile | (a) Your consent; or (b) Performance of a contract with you |
|--|---|---|

| | | |
|--|--|--|
| To process in-App purchases and deliver services including managing payments and collecting money owed to us | (a) Identity (b) Contact (c) Financial (d) Transaction (e) Technical/Device (f) Marketing and Communications (g) | (a) Your consent; or one/more of the following: (b) Performance of a contract with you (c) Necessary for our legitimate interests (to recover debts due to us) |
|--|--|--|

Location (h)
Profile

To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy and the App (b) Asking you to leave a review or take a survey

(a) Identity
(b) Contact
(c) Profile
(d) Marketing and Communications
(e) Financial

(a) Your consent; or one/more of the following: (b) Performance of a contract with you (c) Necessary to comply with a legal obligation (to inform you of any changes to our terms or this policy) (d) Necessary for our legitimate interests (to keep our records updated and to analyse how customers use our services)

To deliver content and advertisements to you
To make recommendations to you about goods or services which may interest you
To measure and analyse the effectiveness of the advertising we serve you
To monitor trends so we can improve the App

(a) Identity
(b) Contact
(c) Profile
(d) Usage
(e) Marketing and Communications
(f) Technical / Device
(g) Content
(h) Location

(a) Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy); or (b) Your consent

Maintaining a public leaderboard

(a) Profile
(b) Content

Necessary for our legitimate interests (providing additional features and increasing enjoyment from our App)

DIRECT MARKETING

You will receive direct marketing communications from us if you have requested/consented to receive our newsletter or created a user account with us and you have not opted out of receiving direct marketing.

You can ask us to stop sending you direct marketing messages at any time by following the opt-out links on any direct marketing message sent to you or by contacting us at any time. Where you opt out of receiving direct marketing messages, this will not apply to personal data provided to us as a result of a registration, purchase or other transactions.

We will not share your personal data with any third party for direct marketing purposes.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the table Purposes for which we will use your personal data above.

External Third Parties namely:

- Service providers acting as processors based in Germany who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide legal, banking, accounting, insurance and consultancy services.
- Regulators and other authorities who require reporting of processing activities in certain circumstances.
- The App Store and Google Play Store which provide hosting and payment services.
- Google which provides analytics services to improve our websites, App, services, marketing, customer relationships and experiences.
- Wix which provides cyber security services.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

8. INTERNATIONAL TRANSFERS

We host your data in Germany. However, many of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

9. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

10. DATA RETENTION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes

In some circumstances you can ask us to delete your data: see Your legal rights below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

11. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your

request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.