PRIVACY POLICY

1. Who we are

1.1 We are dev.privacylab.modbox located at Minsk, ul.Partizanskii.

1.2 This Privacy Policy sets out how we collect and use your personal information when you use the mobile products and services ("Services") offered by dev.privacylab.modbox and the choices available to you in connection with our use of your personal information (the Privacy Policy).

This Privacy Policy should be read alongside, and in addition to, our Terms and conditions **(**"Terms of Service"**)** (Terms).

In case of any contradictions between this Privacy Policy and the Terms, this Privacy Policy will prevail.

1. This Privacy Policy

2.1 By making available the Services we, acting reasonably and in good faith, believe that you:

(a) provide true information about yourself to the extent necessary for use of the Services;

(b) are aware of and accept this Privacy Policy.

2.2 We do not check the user information received from you, except where such check is necessary in order for us to fulfill our obligations to you.

1. Information we collect about you

3.1 In order to provide you with access to the use the Services and with feedback to your e-mail, we will improve, develop and implement new features to our Services, and enhance the available Services functionality. To achieve these objectives, and in compliance with applicable laws, we will collect, store, aggregate, organise, extract, compare, use, and supplement your data that you choose to provide us via e-mail with (hereinafter “processing”). We will also receive and pass this data to our affiliates and partners as set out in the table below and section 4 of this Privacy Policy.

3.2 We set out in more detail the information we collect when you use our Services, why we collect and process it and the legal bases below.

3.3 Your personal information may also be processed if it is required by a law enforcement or regulatory authority, body or agency or in the defence or exercise of legal claims.

We will not delete personal information if it is relevant to an investigation or a dispute.

It will continue to be stored until those issues are fully resolved and/or during the term that is required and/or permissible under applicable/relevant law.

3.4 We do not require you to submit any special categories of personal data, such as personal data relating to your health or religion, as part of your employment application. Please note, if you do not want us to process sensitive and special categories of data about you (including data relating to your health, racial or ethnic origin, political opinion, religious or philosophical

beliefs, sex life, and your sexual orientation) you should take care not to send this information to us.

3.5 If we intend to further process your data for any other purpose to those set out in this Privacy Policy, we shall provide you with details of this further purpose before we commence processing.

1. Data sharing

4.1 We may share your personal information with companies, organisations and individuals inside and outside of the dev.privacylab.modbox where one of the following circumstances applies:

• to other companies in our group, for administrative and management, subject to us taking reasonable measures to ensure that your information is kept secure at all times;

• to trusted third parties businesses, or persons who perform services and process your personal information for us for the purposes listed above, based on our instructions, subject to us taking reasonable measures to ensure that your information is kept secure at all times; and

• to companies, organisations or individuals outside of the dev.privacylab.modbox if we have a belief in good faith that access, use, preservation or disclosure of the information is reasonably necessary to:

- meet any applicable law, regulation, legal process or enforceable governmental request;
- detect, prevent or otherwise address fraud, security or technical issues; or

- protect against harm to the rights, property or safety of the, our customers or the public, as required or permitted by law.

4.2 dev.privacylab.modbox, other selected third party partners with our permission, using their own ad servers, can show advertisements to you.

1. International Transfers

5.1 We may transfer and maintain on our servers or databases some of your personal information outside the European Economic Area (EEA) including in USA, Japan, Russia.

5.2 The countries to which we transfer your data may not have the same data protection laws as your jurisdiction. We take reasonable cyber security measures and/or put in place the Standard Contractual Clauses (e.g. Model Clauses, Data Processing Agreement/Addendum) to ensure your data is adequately protected.

1. Retention Periods

6.1 We will retain your personal information for as long as required to perform the purposes for which the data was collected depending on the legal basis for which that data was obtained and/or whether additional legal/regulatory obligations mandate that we retain your personal information during the term that is required and/or permissible under applicable/relevant law.

6.2 You may request to remove your data on our Services by contacting the Service support (see Section 10 for details).

1. Your Rights

7.1 You have the following rights, in certain circumstances, in relation to your personal information:

(a) Right to access your personal information.

(b) Right to rectify your personal information: you can request that we update, block or delete your personal data, if the data is incomplete, outdated, incorrect, unlawfully received or no longer relevant for the purpose of processing.

(c) Right to restrict the use of your personal information.

(d) Right to request that your personal information is erased.

(e) Right to object to processing of your personal information.

(f) Right to data portability (in certain specific circumstances).

(g) Right not to be subject to an automated decision.

(h) Right to lodge a complaint with a supervisory authority.

7.2 If you would like to exercise these rights, please contact Support Service at modbox0101@gmail.com. We will aim to respond to you within 30 days from receipt of request. We will need to verify your identity before we are able to disclose any personal data to you.

1. Security Measures

8.1 We take technical, organizational and legal measures, including, where suitable, encryption, to ensure that your personal data are protected from unauthorized or accidental access, deletion, modification, blocking, copying and dissemination.

1. Changes to this Policy

9.1 From time to time, we may change and/or update this Privacy Policy. If this Privacy Policy changes in any way, we will post an updated version on this page. We will store the previous versions of this Privacy Policy in our documentation achieve. We recommend you regularly review this page to ensure that you are always aware of our information practices and any changes to such.

1. Contact Us

10.1 If you have any questions, please send your inquiries to Service support at modbox0101@gmail.com. So we can deal with your enquiry effectively, please quote this Privacy Policy. We will aim to respond to you within 30 days from receipt of request.

10.2 All correspondence received by us from you (written or electronic inquiries) is classified as restricted-access information and may not be disclosed without your written consent. The personal data and other information about you may not be used without your consent for any purpose other than for response to the inquiry, except as expressly provided by law.

10.3 The e-mail address of our DPO is modbox0101@gmail.com.