

# PRIVACY POLICY

This Privacy Policy (hereinafter referred to as the Policy) applies to all personal data received by Spider Group LLC (OGRN 1022301969634, TIN 2312080990), hereinafter referred to as "The Company", "we", "us" and "our", in any format about users of the FASTcall mobile application. The Company strictly ensures that the processing of personal data complies with this Privacy Policy. We understand that users of the mobile application "FASTcall" (hereinafter — the mobile application, FASTcall) value their own privacy.

This document contains important information regarding the processing of personal data by the Company.

We do not and will not sell your personal data. We also do not offer financial incentives, other prizes or services in exchange for the retention or sale of your personal data. We do not infringe on the interests of people who exercise their rights to privacy.

THE USE OF THE MOBILE APPLICATION, AS WELL AS ITS INDIVIDUAL FUNCTIONS, MEANS THE EXPLICIT AND UNCONDITIONAL CONSENT OF THE USER OF THE MOBILE APPLICATION TO THIS POLICY AND THE TERMS SPECIFIED THEREIN; IN CASE OF DISAGREEMENT WITH THESE TERMS, THE USER OF THE MOBILE APPLICATION MUST STOP USING THE MOBILE APPLICATION. THE USER AGREES TO THE PROCESSING OF PERSONAL DATA BY CLICKING THE APPROPRIATE BUTTON WHEN REGISTERING IN THE APPLICATION.

Attention: In the case of any discrepancies between the Russian and English versions of this Policy, the Russian version is crucial.

## 1. GENERAL TERMS

- 1.1. Address and contact details of the administrator: Spider Group, LLC (OGRN 1022301969634, TIN 2312080990), located at: 2/4 Novitskogo str., Krasnodar, 350062, office 1, contact email [spider@spider.ru](mailto:spider@spider.ru).
- 1.2. Personal data is data related to a living person, which can be used to establish their identity. The identity can be established only on the basis of this data or in connection with any other information that is available or may fall into the possession of the data controller. This Policy is developed in accordance with Federal Law No. 152-FZ of July 27, 2006 "On Personal Data" and by-laws for the Russian Federation and the General Data Protection Regulation (GDPR) for the European Union. This Privacy Policy is governed by the law of the Russian Federation and, for residents of the European Union by the General Data Protection Regulation (GDPR).

## 2. PURPOSE OF PERSONAL DATA PROCESSING

- 2.1. The purpose of processing personal data of users of the mobile application is to identify the user when logging in to the mobile application; to inform the user of the "FASTcall" project if the user sends a corresponding request to the Company. The Company uses your personal data for the following purposes:
  - 2.1.1. to grant access to the mobile app;
  - 2.1.2. to monitor and manage user accounts;
  - 2.1.3. providing support to users;
  - 2.1.4. to improve, analyze, configure, and maintain the health of the mobile app.
- 2.2. Depersonalized user data collected through Internet statistics services is used to collect information about user actions in the mobile application (for example, information about opening or closing the application, the status of the device).
- 2.3. The Company processes the following data:
  - 2.3.1. technical data that is automatically transmitted by the device with which the user uses the mobile application, including information stored in files (for example, MAC address, SN, IMEI or other device ID, depending on the device OS, device type and personal settings, will be collected to manage the device and eliminate failures in the application);
  - 2.3.2. personal data (e-mail, phone number) required for user authorization in the mobile application, as well as sending responses to user requests. In addition, personal profile data is processed, for example, account data, including the account ID;
  - 2.3.3. IP address;
  - 2.3.4. country of residence or time zone;
  - 2.3.5. information received from third parties;
  - 2.3.6. phone numbers stored in the address book of their mobile phones.

## 3. THE PROCEDURE FOR THE COLLECTION, STORAGE, TRANSFER AND OTHER TYPES OF PROCESSING OF PERSONAL DATA

- 3.1. The Company acts as an administrator in relation to the personal data of Users of the mobile application.
- 3.2. The Company processes the personal data of the user of the mobile application (for example, e-mail and phone number) only if they are filled in and sent by the user independently through special forms, including when logging in to the mobile application, located in the mobile application. By filling out the relevant forms and submitting their personal data to the Company, the user of the mobile application agrees to the processing of personal (personal) data by putting the appropriate sign in the proposed form.
- 3.3. The User grants the Public permission to access the phone numbers stored in the address book of their mobile device. The User confirms that he has the right to provide these numbers to the Company. The Company processes such phone numbers solely for the purpose of identifying users of the mobile application. If the phone number from the address book of the User's mobile device is authorized in the mobile application, the User can make calls to this phone number through the mobile application, using the remote assistant function.
- 3.4. The user grants the Public permission to access the device's camera. The app's access to the user's camera is required to make video calls using augmented reality.
- 3.5. The Company processes the User's contacts using a third-party service called Agora. Agora is a service provided by Agora Lab, Inc. This service processes contacts, images, and videos from the app. The Privacy Policy of Agora Lab, Inc. can be found on the website <https://www.agora.io/en/privacy-policy>.
- 3.6. The user grants the right to access location services (geolocation). The Company determines the location in the form of the user's geographical coordinates solely for the purpose of collecting statistical information without reference to other user data.
- 3.7. The Company automatically receives information about the IP address of the user of the mobile application, and also processes depersonalized data about the user of the mobile application using third-party services.
- 3.8. Data tracking:
  - 3.8.1. The Company uses Google Analytics for Firebase, AppsFlyer.
  - 3.8.2. Google Analytics for Firebase is an analytics service provided by Google Inc. This service is used to determine the duration of the session in the application, information about the user's device, the number of sessions from the user's device, the

location of users, and the OS of users' devices. Firebase Analytics can exchange data with other services provided by Firebase, such as Crash Reporting, Authentication, Remote Config, and Notifications. In order to ensure the functioning of Firebase Analytics, the Application uses some mobile equipment identifiers or technologies similar to cookies. The user can express their refusal to use certain Firebase features in the settings of their mobile device. For example, you can change the ad settings available on your phone, or follow the instructions that apply to Firebase. The User can read the Privacy Policy of Google Analytics for Firebase on the page <https://firebase.google.com/support/privacy>.

- 3.8.3. AppsFlyer is an analytical service provided by AppsFlyer Ltd. This service processes data on the use of network resources. For more information about the AppsFlyer Privacy Policy and Policy, please visit the Privacy Policy page <https://www.appsflyer.com/privacy-policy>.
- 3.8.4. These services help you to depersonalize the study of user behavior in the mobile app (how often the user uses the mobile app, events that occur in the mobile app). These operators provide an appropriate level of personal data protection and comply with the legislation of the Russian Federation and the GDPR.
- 3.9. The User does not have the right to transfer personal data of a third party to the Company without appropriate permissions. Before disclosing personal information to a third party, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this Policy.
- 3.10. The security of personal data processed by the Company is ensured by implementing the legal, organizational and technical measures necessary to fully comply with the requirements of the current legislation in the field of personal data protection.
- 3.11. The User undertakes not to provide the Company with personal data (photos, videos and other data related to personal (private) data in accordance with the current legislation), except for providing e-mail and phone number for authorization in the mobile application and feedback. In case of violation of this clause, the User is solely responsible for the transfer of personal data, and it is considered that the user has given consent to the processing of the transferred personal data. The Company, in turn, undertakes to immediately delete all information received from the User containing personal data that is not necessary to achieve the purposes of processing personal (private) data.

- 3.12. The Company ensures the security of personal (private) data and takes all possible measures to exclude access to personal (private) data of unauthorized persons. The Company has the right to disclose personal (personal) data of users of the mobile application to any of the Company's employees, consultants, agents of the Company, if it is necessary for the purposes set out in this Policy.
- 3.13. The user's personal data will never, under any circumstances, be transferred to third parties, except in cases related to the implementation of current legislation.
- 3.14. The Company stores your personal data for no longer than is required for the purposes of processing personal data, if the period of storage of personal data is not set. The processed personal data is subject to destruction upon achievement of the processing purposes, in case of loss of the need to achieve these purposes, at the request of the owner of the personal (private) data, as well as in other cases established by the current legislation.
- 3.15. The Company stores the personal (private) data of users of the mobile application on servers located on the territory of the Russian Federation that meet the security requirements, in accordance with the legislation of the Russian Federation, at the address: 2/4 Novitskogo Str., Office 1, Krasnodar, 350062, Russia.
- 3.16. You may at any time:
  - 3.16.1. withdraw your consent to the processing of one's personal data by sending a written notice to the Company at the address: 2/4 Novitskogo Str., Office 1, Krasnodar, 350062, Russia. The Company deletes one's Personal (private) Data without undue delay to the extent that the collection and processing of personal data is based on the withdrawal of consent.
  - 3.16.2. use the right to object to the processing of your personal (private) data, according to which the Company considers your objection and without undue delay deletes one's personal data processed for the purpose to which you object, if there is no other legal basis for the processing and storage of this data or the storage of this data is not required in accordance with current legislation.

## 4. YOUR RIGHTS AND CONTROL MECHANISMS

- 4.1. Data protection laws in the countries of the European Union and other territories grant certain rights to their citizens in relation to their personal data. While other jurisdictions may grant their citizens

fewer rights, the Society creates tools designed to enforce the rights of its users around the world.

- 4.2. As a permanent resident of the European Union, you have the following rights with respect to your personal data:
  - 4.2.1. The right to access. You have the right to access your personal data that is stored by the Company, i.e. the right to request free of charge 1) information about whether your Personal Data is stored, 2) access and/or 3) duplicates of the stored Personal Data. You can use this right to access your Personal Data through the mobile app.
  - 4.2.2. The right to rectification. When processing your Personal Data, the Company will take appropriate measures to maintain the accuracy and relevance of your Personal Data for the purposes for which it is collected.
  - 4.2.3. The right to erasure. You have the right to request the deletion of your Personal Data.
  - 4.2.4. The right to restriction of processing. You have the right to request that data processing be restricted in any of these cases: 1) you deny the accuracy of personal data, the restriction occurs while verifying the accuracy of personal data; 2) the processing of personal data is illegal, but you do not require the deletion of personal data, but restrict their use; 3) You have objected to the processing for a time until the legality of our arguments over your arguments is proved.
  - 4.2.5. The right to object. Where the processing of Personal Data is based solely on legitimate interests in accordance with Article 6 (1) (f) of the GDPR and this Privacy Policy, you may exercise your right to object. If you object, the Company will not process your Personal Data when there are no compelling and prevailing legal grounds for such processing, as described in article 21 of the GDPR, in particular when the data is necessary to establish, implement or protect legal claims.
  - 4.2.6. The right to data portability. You have the right to receive personal data that concerns you in a structured, widely used and machine-generated format, and the right to transfer this data to another administrator without the intervention of the Company if: 1) the processing is based on consent; 2) the processing is carried out in an automated way. In exercising your right to data portability, you have the right to request the transfer of data from one administrator directly to another administrator, if technically possible.

- 4.2.7. You also have the right to file a complaint with the supervisory authority. If you believe that your personal data is not being processed legally, you have the right to file a complaint with the supervisory authority.
- 4.2.8. The right to be informed in the case of a violation of the security of personal data. If there is a possibility that a particular case of violation of the security of personal data entails a high risk to the rights and freedoms of individuals, we are obliged to notify the data subject of these violations without any delay.
- 4.2.9. The right to withdraw consent to the processing of personal data. If the processing of certain personal data is carried out on the basis of consent, you have the right to withdraw your consent to the processing of personal data at any time in writing by sending an objection to the processing of personal data to the email address [spider@spider.ru](mailto:spider@spider.ru).

## 5. FINAL CLAUSES

- 5.1. The User can receive any clarifications on the issues of interest concerning the processing of his personal data, including sending a notice of termination of the use of personal data by sending a corresponding request to the Company at the address: 2/4 Novitskogo str., Office 1, Krasnodar, 350062, Russia, or by e-mail [spider@spider.ru](mailto:spider@spider.ru).
- 5.2. This document will reflect any changes to the Company's Personal Data Processing Policy. The policy is valid indefinitely until it is replaced with a new version.
- 5.3. The current version of the Policy is freely available on the Internet at [https://fastcall.app/privacy\\_policy\\_mob\\_eng.pdf](https://fastcall.app/privacy_policy_mob_eng.pdf).
- 5.4. The Company has the right to make changes to this Privacy Policy without the User's consent.