

# Privacy policy and policy for protection of confidential information and personal data

(hereinafter - Policy)

## 1. Introduction

1.1 This Policy for protection of personal data applies to all Users (Company customers and third parties) of the website's information systems (hereinafter - Products) of the service [www.spheroiduniverse.io](http://www.spheroiduniverse.io).

1.2 The website [www.spheroiduniverse.io](http://www.spheroiduniverse.io) uses the personal data of the Users in order to provide that Users receive the Products of the proper quality in a convenient form and in a timely manner.

1.3 This Policy applies to the data of Users and other persons who visit the site [www.spheroiduniverse.io](http://www.spheroiduniverse.io), as well as on any forms of using personal data: oral, electronic or written.

1.4 The service [www.spheroiduniverse.io](http://www.spheroiduniverse.io) (hereinafter - Site) is provided by Glen Falls LLC (hereinafter - Company). This Policy was adopted by the Company to fulfill its obligations to protect the personal data of Users.

1.5 Users expressly agree to the processing of their personal data, as described in this Policy. Processing means any operation with personal data regardless of the means used and procedure, in particular, the collection, recording, systematization, accumulation, storage, combining, elaboration, updating, modification and retrieval of personal data, as well as the use of personal data, processing on paper and/or by entering data into an electronic database, i.e. including with the use of automation, transmission, distribution, provision, access, depersonalization, blocking, removal and destruction (hereinafter - processing).

## 2. Composition of personal data

- name and surname of the User
- date of birth
- gender

2.1 Personal data in accordance with this Policy shall include information that allows the User to be identified.

2.2 Personal data that the Company requests from the User (depending on the Products used)

include:

- mobile phone
- E-mail address
- other contact information, such as address of residence
- identity document data
- previous places of work with the indication of contacts of organizations • financial information: credit cards and bank accounts numbers
- additional information that the Company requests from the Users to verify their identity: documents on education or other relevant documents to verify the identity and professional information
- any information necessary for the implementation of special requests (for example, on the state of health)

2.3 The Company does not process User data on religious and other beliefs and personal life.

2.4 Most of the information that the Company uses is data that the User or a person acting on his behalf has knowingly submitted to the Company. However, in some cases, the Company uses data obtained in result of a comparison of information previously provided by the User, as well as through interaction with the User or on the basis of personal information about the User received from a third party.

2.5 By agreeing with the Policy, the User gives a direct and written consent to the processing of his personal data.

2.6 The User has the right to choose which personal data he will provide. In the event that the User does not provide certain data, this may affect the interaction with the Company.

2.7 The User at any time can view, update or delete any personal data that is included in the User profile. To do this, the User can edit his profile in online mode.

2.8 In the event that the User decides to delete his profile, the Company will retain the right to use any personal data previously provided by the User for inclusion in the User profile for the purpose of maintaining records and ensuring the quality of the services (unless the Company is obliged by law to remove or terminate processing and use of personal data of a specific User).

2.9 The User has the right to ask for correction and/or deletion of his personal data. In order to request it, he has to contact the Company. Deletion of personal data will result in inability to continue using the Products.

### **3. The transfer and use of personal data, the purpose of collecting personal data**

3.1 The purpose of the Company in collecting personal data is to provide Users with safe and effective Products.

3.2 Users agree that the Company may collect, use and promulgate their personal data for:

- provision of services and customer support at the request of Users
- charging fees for the use of the Products (depending on the Products used)
- comparison of personal data to confirm their accuracy and verification by third parties in cases provided by law
- providing answers to requests for information and services
- informing Users about Products, marketing, service updates and promotional offers
- market research
- providing more personalized services, including provision of information and services of the third parties

3.3 When transferring personal data, the Company complies with the following requirements:

- does not disclose the personal data of the User to a third party without written consent, necessary to prevent a threat to the life and health of the User, and also in cases established by law
- does not disclose personal data of the User for commercial purposes without his written consent
- warns the persons receiving the personal data of the User that these data can only be used for the purposes for which they are communicated and requires these persons to confirm that this rule is observed. Persons receiving personal data of the User are obliged to comply with the confidentiality mode
- allows access to personal data of Users only to specially authorized persons, and these persons should have the right to receive only those personal data that are necessary for performing specific functions

3.4 The Company does not sell and does not provide personal data of Users to third parties for marketing purposes not envisaged in this Policy, without the express consent of Users. The Company can combine depersonalized data with other information received from third parties and use it to improve and personalize services, informational content and advertising.

3.5 The Company may engage third parties to perform certain functions and / or information processing and may provide data to:

- providers who assist in the provision of Products (for example, collection of payments, User

services, consultant services)

- law enforcement authorities, other state authorities or third parties in response to a request for information

3.6 The Company reserves the right to disclose personal data at the request of the court, law or state authority. The Company also reserves the right to retain the collected information and use it for accounting and tax operations.

#### **4. Cookies-files (cookies, hereinafter - cookies) and other information collected when visiting the site**

4.1 The User has the right to visit the Service / site without registration or personal identification in any other way.

4.2 The Company may use cookies and web beacons to assist in the analysis of the flow of information, customization of services, content and advertising, as well as to measure the effectiveness of sites and ensure reliability and security, for the purpose of market research, and to improve functionality of websites.

4.3 When the User visits the site, the Company collects information about how the User uses this site. Examples of such information include the Internet-Protocol address, automatically assigned to the computer each time when log on to the Internet, the date and time of the visit, the pages viewed and the amount of time that the User spends viewing each page, the type of Internet browser used, the device operating system and URL-addresses of any sites that the User visited before and after visiting the site. This information does not allow to identify the identity of the User, if the User does not create a profile, but allows to track the device used.

4.4 Cookies are a text file containing a small amount of information that is downloaded to the User's computer or mobile device when the User visits the website. Afterwards, cookies are sent back to the outgoing web site. Cookies allow the website to recognize the User's device.

4.5 Cookies remember the User's preferences. Cookies are also used to ensure that advertisements that the User sees on the Internet are more relevant.

4.6 The User is hereby notified that the cookies are not personalized. Users can always refuse saving them, this function is determined by the settings of the User's browser. However, this can lead to restrictions on the use of the website, including settings for creating a User profile.

4.7 The Company reserves the right to modify, update or correct any of the above statements regarding cookies, as well as any information in Privacy Policy, User Agreement or other documents published on the site, without prior notice, by posting an appropriate statement on the website and sending email notifications to the Users. The continued use of the website by the User means that he accepts and agrees with the revised Statement regarding Cookies.

## 5. Security

5.1 Personal data of Users is kept from disclosure in various ways (encryption, passwords). The Company takes all reasonable measures to protect the provided data from destruction, distortion or disclosure.

5.2 Cross-border transfer of personal data is not carried out. The Company reserves the right to choose any channels for the transmission of information regarding personal data, as well as the content of the transmitted information.

5.3 Since the security of the User's data is important to the Company, the Company uses the secure connections protocol ("SSL") software to encrypt the provided personal data. If the SSL function is enabled in the User's browser (in most cases), the data will be transmitted in encrypted form. The User can determine whether the data is being transmitted in encrypted mode using SSL, by finding the icon with "closed lock" or "bulk key" symbol on the bottom toolbar in the browser window. The User can also determine whether the data will be encrypted using SSL, paying attention to the prefix of the web address specified for this page, where instead of "http" there should be "https". In case the corresponding symbol and the prefix "https" are absent, the personal information that is being specified will most likely not be encrypted before transmission.

5.4 Personal information collected online is stored by the Company and / or service providers in databases protected by physical and electronic means of control, technologies of the access control system and other acceptable security measures. Despite this, such security measures cannot prevent all losses, malicious use or modification of personal data, and the Company is not responsible for any damage or loss that result from such incidents.

5.5 The User hereby acknowledges, confirms and agrees that the technical processing and transmission of information of the Company's Products may include the transmission of data through various networks, including via unencrypted communication channels of Internet, which is never completely confidential and safe.

5.6 The User also understands that any messages and / or information sent via Company's Server may be unauthorizedly read and / or intercepted by third parties.

5.7 By using the Company's Products, the User is aware and agrees that the Products may be subject to malfunctions and downtime due to which Users may incur losses, the Company is not liable for any malfunction and subsequent loss of data and other consequences in case of malfunctions and downtime of Products of the Company.

5.8 The User by providing the data agrees to the processing, i.e. the implementation of any actions (operations) with the data provided.

5.9 The User hereby consents to the Company the provision of the transferred information to third parties, including those supporting the Company's services, in the quantity necessary for such

support and / or other persons; rights and responsibilities for access to relevant information are established by applicable law.

5.10 The consent of the User to the processing of the data provided is valid for an indefinite period and shall remain in effect until the time of its withdrawal in writing. The Company undertakes to terminate the processing of data in a reasonable time after receiving the relevant User requirement.

## **6. Changing this Policy**

The Company is constantly improving ways of collecting, storing and processing data, including the Security Policy. The Company may at any time change this Policy by notifying the Users about it on the Company's website. The continued use of the Products after making such changes confirms the User's agreement with such changes.