

PRIVACY POLICY

Effective as of January 2015

Last amended: October 2015

1. GENERAL PROVISIONS

This Privacy Policy is an annex to the Terms of Use (hereinafter, the “**Terms**”) published on the Website, which regulates privacy practices and procedures regarding the collection, use and disclosure of personal data through the Application.

As used herein, “**personal data**” is the information that specifically identifies an individual and information about that individual's activities, such as information about his or her use of the Application, when directly linked to personally identifiable information.

Any and all terms and conditions defined by the Terms shall be applicable to and have similar meaning in this Privacy Policy.

By using the Application, the Client consents to this Privacy Policy. By registering and using the account in the Application, the Client allows collecting, use and disclosure of his or her personal data, due to this Privacy Policy and applicable legislation.

2. COLLECTION OF PERSONAL DATA OF THE CLIENTS

Each Client may use the Application without disclosing his/her name or any personal data; therefore, all Clients who use the Application can remain anonymous unless they decide to perform authorization in the Application.

For more comfortable use of the Application, at installation of the Application on a mobile device, Clients may be requested to provide data, such as e-mail address, full name, date of birth, sex, location (town/city), occupation, family related information, interests and hobbies, social network authorization data, etc. This information shall be included into the Client's account, through which the Client uses the Application.

The Client's account on the Application enables to identify each Client, including, but not limited to, using the profile on Facebook, LinkedIn. When logging in in the Application for the first time, the Client gives the Contractor access to his or her social network account. Pay attention! When the Client logs in via social networks, the Contractor gets access to all the viewable information provided in the social network account according to its privacy settings.

Also, the Contractor's servers store information on the Client's activity in the Application. Furthermore, the Contractor collects and stores data such as information on provided or proposed Advice and descriptions thereto. Considering that the Contractor records information related to access to the Application, personal data may include some information, which is not directly provided by the Clients.

Additionally, the Contractor shall be entitled to collect the following information:

- data on the Client's mobile device (model, version of the operational system as well as mobile network data and telephone number);
- data from the logs that contain information about the use of the Application or browse of the information provided through the Application (including, but not limited to, comprehensive data about the use of the Application including search requests, data about telephone calls including telephone numbers of incoming, outgoing and forwarded calls, the date, time and duration of calls, as well as SMS routing information, IP addresses, hardware event data including failures and actions within a system, settings, browser type and language, request date and time and destination URL);
- location data (including GPS data sent by a mobile device, data of various positioning technologies).

Each Client of the Application shall be entitled to review, edit and delete his/her personal data in his/her account.

3. USE OF PERSONAL DATA

Immediate access to personal data of the Clients is allowed only to the Contractor's authorized employees involved in the Application maintenance. Such employees shall strictly keep confidentiality of and prevent third party or unauthorized access to personal data.

The Contractor may use the Application access information to troubleshoot the Application and ensure high quality services to the Clients. In addition, personal data may be used for the analysis of the Clients' behavior, assessment of the interest in various sections of the Application.

The Contractor may use personal data of the Clients for administrative purposes, e.g. for internal investigations of violations of the Terms and this Privacy Policy.

All publications of the Clients identified by them as public shall be generally available in the Application, signed with the name indicated at installation of the Application on the Client's mobile device and available for review by all Clients of the Application.

The Contractor retains the right to share personal data of the Clients with founders and managers of the Contractor as well as with all branches, representative offices and other companies related to the Contractor. At that, the Contractor shall demand that all persons that have access to the information comply with provisions of this Privacy Policy.

The Contractor may use public data of the Client's account in the Application and information about its activities in the Application for commercial purposes, including advertising.

The Contractor may use e-mail addresses for sending Application news or updates. At that, the Client can unsubscribe from such e-mails at any time.

4. INFORMATION SHARING AND DISCLOSURE

The Contractor shall not sell, provide on lease or share any personal data of the Clients to/with third parties, except for business partners of the Contractor, inter alia, the Funds or payment systems, in order to enhance the quality of the services.

The Contractor enables Clients' sharing the information on other Clients (the name; the information on provided or proposed Advice and descriptions; the section, in which the Advice is provided or proposed) via Facebook and other social networks to increase the popularity of the Application.

The Contractor cooperates with government and law enforcement officials to enforce and comply with the law. The Contractor may disclose personal data in the good faith belief that it is lawfully authorized to do so, or that doing so is reasonably necessary or appropriate to comply with the law or with legal process or authorities; respond to any claims, or to protect the rights, property or safety of the Contractor, its Clients, employees or the public, including without limitation to protect the Contractor or its Clients from fraudulent, abusive, inappropriate or unlawful use of the Application.

On official request, the Contractor may disclose to officials information necessary for the investigation, e.g. the Client's name, address, phone number, e-mail, date of birth, etc.

The Contractor may disclose personal data of the Client to the other Client's request, if the Client fails to receive the compensation of the value of Advice as prescribed in the Terms, to ensure the Client's possibility to file the case to the court.

The Contractor shall provide copyright owners with all information required for control of use of their intellectual property on the Internet.

5. INFORMATION SECURITY

Measures are implemented in the Application to ensure safety and protection of the Clients' personal data from loss, misuse, unauthorized access, use, disclosure, amendment or destruction.

The Contractor reminds that none of the existing data transmission methods can be absolutely safe. Therefore, despite all safety measures implemented, the Contractor cannot fully guarantee integrity and safety of the information.

The Contractor shall not bear responsibility for unlawful acts of third parties, hackers, intruders and other offenders of applicable legislation that can violate provisions of this Privacy Policy and try to collect, either fully or in part, personal data of the Clients and to use it for personal advantages.

When running the Application, the Client does not acquire intellectual property rights to the Application (except for as stipulated in the Terms) or to the Application-related content. The Client may use the content of the Application

provided only that the Client has obtained approval from the content owner or if such use is envisaged by laws. This Privacy Policy does not entitle the Clients to use any distinctive features of the Application. The Client shall not delete, hide or amend legal notices in the Application.

Some functions of the Application allow the Clients to download, add, store, send or receive content. At that, any and all intellectual property rights related to such materials shall remain with the owners.

The Application systems automatically analyze the Client's content in order to provide information useful for the Client. Furthermore, such analysis allows identifying spam and malicious software. The analysis is performed when sending, receiving and storing the content.

6.LINKS TO EXTERNAL WEBSITES

The Application may have links to external websites. The Contractor shall not bear any responsibility for the content and operation of and ensuring confidentiality by such websites, and for any damage relating to or resulting from the Clients' visits to such websites.

This Privacy Policy does not cover any transfer of personal data in case of any visit to external websites, even if such websites have links to the Contractor's Website or Application web-page on AppStore or GooglePlay. The Contractor shall not bear any responsibility for operations of external websites. Collection and transfer of personal data of the Clients is regulated by respective data use documents published on external websites.

7. REQUESTS AND COMPLAINTS OF THE CLIENTS CONCERNING PERSONAL DATA

To the extent that the Client believes that provisions of this Privacy Policy regarding personal data have been violated or if the Client has any confidentiality issues, the Client shall use feedback function and send the respective request to the Contractor using the e-mail address indicated in the Terms, on the Website or Application web-page on AppStore or GooglePlay.

The Contractor shall verify all notices of alleged violations and, according to applicable legislation and the Terms, deactivate accounts if their owners systematically violate the laws or perform other prohibited actions due to the Terms.

8.PRIVACY POLICY AMENDMENTS

The Contractor retains the right to update, edit and amend this Privacy Policy without additional notice to the Clients. Such amendments shall take effect on the date of publication of the updated version of the Privacy Policy on the Website or Application web-page on AppStore or GooglePlay, unless other date is indicated in the updated version of the Privacy Policy.