

Web: <http://finprophet.com>

Mail: info@finprophet.com

PRIVACY POLICY

Current document describes how Individual entrepreneur Apollon V. Stepanov (“FINPROPHET” or “we”) uses personal data as well as other types of information (including Additional Information) collected from you when you visit FINPROPHET website at <http://finprophet.com> (“FINPROPHET website”). This document only addresses the usage and disclosure of information by FINPROPHET.

By using FINPROPHET website and/or registering an account on FINPROPHET website you represent and warrant that you are at least 18 years old or a major of the respective laws, and have full capacity to contract under applicable laws.

In case you do disagree with our practices (including of the processing of your personal data), please do not use FINPROPHET website and the services provided by FINPROPHET. We would like to bring to your attention that by using FINPROPHET website as well as services you are also a subject to the “Terms and Conditions”. You are obliged to read carefully the document “Terms and Conditions” before using the FINPROPHET website and/ or using FINPROPHET services, as they affect your obligations and legal rights, including but not limited to waivers of rights and limitation of liability. All terms not defined in the Privacy Policy are defined in the “Terms and Conditions”.

Current Privacy Policy is concluded between you and Individual entrepreneur Apollon V. Stepanov registered in the _____ (registration number _____) having its registered office address _____ . In respect of EU General Data Protection Regulation (GDPR) Individual entrepreneur Apollon V. Stepanov is considered to be data controller.

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1. What data do we collect from you and why?

FINPROPHET collects personal data which you provide to us when you register and create an account on FINPROPHET website, which contains: your name and surname, e-mail, country, language, details of requests to FINPROPHET, transactions you have made in FINPROPHET website, as well as communication between FINPROPHET and you. Additionally, from users of FINPROPHET website, FINPROPHET will collect data necessary for payment and fraud research, as well as IP address(es). (“Personal Data”).

FINPROPHET uses Google Analytics and Yandex Metrica which means Google Analytics and Yandex Metrica stores cookies on your PC to keep track of usage data. What are cookies you can see from here: http://ec.europa.eu/ipg/basics/legal/cookies/index_en.htm. FINPROPHET use cookies for variety of purposes in order to improve our clients, including your, experience on FINPROPHET website. FINPROPHET uses cookies for marketing (i.e. provide you with advertising on other websites you visit), analytical purposes (analysing user activity for improving FINPROPHET website), for remembering you preferences (and therefore making your use of the website easier). By accessing or using FINPROPHET website, you are consenting to the use of cookies. In case you do not want your data to be collected with Google Analytics we urge you to visit Google Analytics opt-out page and install opt-out browser add-on, which will prohibit sending information from the websites you use, to Google analytics.

FINPROPHET also collects data by which we can no identify you and therefore is not considered to be personal data. That includes also data collected automatically when you enter FINPROPHET website. This may possibly contain cookies, browser analysis tools, web server logs, pixel tags, and web beacons. This also contains facts about the devices you use to access FINPROPHET website (i.e. including but not

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limited to mobile device model, browser type, and other system settings). We would like to bring to your attention we may possibly use software tools, for instance Javascript, to collect and measure session information (i.e. including but not limited to download errors). (“Additional Information”)

The purpose of collecting the aforementioned data is to provide you with the service and to improve as well operate FINPROPHET service and website. FINPROPHET also use the information collected to develop and draw up user analytics. In addition the purpose is to have a contact with you in order to provide customer support or with additional information you need, and when appropriate send you security alerts, administrative messages, and reminders, respond to your comments and questions. FINPROPHET only collects personal data necessary for these purposes. In addition, FINPROPHET uses your personal information also to investigate, protect, and prevent illegal, fraudulent or unauthorized activity.

In case you have decided to be a part of Bonus, Marketing, Promo program FINPROPHET will collect the information about your e-mail, name and surname.

The legal basis for processing is the contract between you and FINPROPHET (Privacy Policy and Terms and Conditions), to which you have agreed upon registration on FINPROPHET website.

2. Can we disclose your personal information or additional information and in which cases?

FINPROPHET is doing all the processing of personal data, except storing.

We bring to your attention that Additional Information may be disclosed with analytics companies to optimize our work and better understand learn information about how FINPROPHET website uses the site. FINPROPHET shall not sell or rent

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your personal data to third parties for their marketing purposes without your explicit consent. FINPROPHET will not disclose your Personal Data to third countries or parties others than and apart from as provided herein, except it is necessary to provide the services, when required by law, or if we have good faith belief that such action is reasonably necessary to:

- (a) customer service;
- (b) Escrow or any other processor of your payment;
- (c) When required by the law, i.e. to law enforcement, government officials, to follow our legal obligations under court order or legal process served on FINPROPHET;
- (d) grant and protect FINPROPHET legal rights, property and interests;
- (e) with your consent to disclose your personal data.

We would like to bring to your attention that by registering in FINPROPHET website your account name and comments posted on FINPROPHET website will be publicly available. You also have the option to disclose other types of data (including but not limited to profile picture, location) and are qualified to change that whenever you decide.

3. Where do we store your data?

FINPROPHET is storing your data in BEGET LLC and TIMEWEB LLC. Information about them is accessible from: beget.com/en and timeweb.com. BEGET LLC and TIMEWEB LLC regularly conducts security audits and assessments in order to meet data protection requirements. BEGET LLC and TIMEWEB LLC has taken precaution measures to provide security of the cloud as well as to grant the security and integrity of the physical servers, storage, networking and hosting facilities. The data is physically stored in Russian Federation.

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FINPROPHET reserves a right to change the provider for storing the data. When it will be done then FINPROPHET will notify you via updating privacy policy and sending you an e-mail about it.

4. Security of the data

FINPROPHET has taken technical and organisational measures to grant the protection of your personal data. FINPROPHET uses measures of Logical Access Control (i.e. password procedures, multifactor authentication, automatic log-out or password protected screensaver after certain time period without user activity, intrusion detection / intrusion prevention (PenTest), logging of access), Data access control (i.e. authentication concept, documentation of authentications), Availability control (i.e. Backup and recovery procedures, Separate Storage of Data, Firewall Protection), Data Transfer Control (i.e. Secured data transfer (SSL), End to End Encryption (E2EE), Encryption of Communication Email (GSuite)), Separation control (i.e. individual user profiles, clear physical and/or logical separation of data, authorization concept, separated systems for development, test and productive environment, pseudonymisation of data (Data Masking)), Entry Control (i.e. authorization and access rules, event Logging).

FINPROPHET applies commonly accepted industry standards to protect your personal data. FINPROPHET would like to bring to your attention that using Wi-Fi or the Internet is not always secure and therefore you should apply some security measures (including but not limited to installing firewall, installing antivirus and anti-spyware software, using secure passwords, checking the security settings of

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your browser). As a result, FINPROPHET cannot guarantee or warrant the security of any information you disclose or transmit to us via online.

BEGET LLC has taken precaution measures to provide security of the cloud where your data is stored.

5. Your rights

You have the right to determine how long your personal data will be retained (hold) by FINPROPHET by deleting or modifying your personal data on your FINPROPHET website profile. If you want to delete your account you need to write to us on info@finprophet.com. If you want to delete your account then your personal information is deleted from FINPROPHET website (as well as backups), although we bring to your attention that FINPROPHET may keep your information in its database as it may be necessary to deter fraud. Upon deleting your account, your personal information will not be used by FINPROPHET for any further purposes, nor disclosed to third parties, except when required by the law, including but limited to prevent fraud or money laundering.

We would like to bring to your attention that in case you violate the contract between us (privacy policy and/or terms and conditions) then your account will be closed until the problem is resolved.

If you have agreed to receive our e-mails and/or newsletters you have the right to withdraw your consent at any time. By logging in into your FINPROPHET account you can modify or delete the Personal Data you have provided to us by updating your profile.

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You have the right to object to processing that is likely to cause or is causing damage or distress; to receive the personal data concerning you, which you have provided to FINPROPHET, in a structured, commonly used and machine-readable format; and to prevent processing for direct marketing. You also have a right to right to lodge a complaint with a data protection supervisory authority in case you are in a position your privacy was infringed.

FINPROPHET keeps your personal data solely until it is needed to provide you with the Services or until necessary to comply with our legal obligations or resolve disputes.

6. Use of cookies

FINPROPHET use cookies (Google Analytics, Yandex Metrica) for making FINPROPHET website easier to use and to improve FINPROPHET website and our services to your interests and necessities. Cookies used may aid to speed up your future activities and experience on FINPROPHET website. FINPROPHET reserves the right to use cookies to put together anonymous, aggregated statistics that provide us the information in order to improve FINPROPHET website, its content and FINPROPHET services. We point out that FINPROPHET cannot identify you from this information. In case you do not agree to our use of cookies in abovementioned way, you should set your browser settings accordingly or stop using FINPROPHET website. We would like to bring to your attention that when you disable the cookies that FINPROPHET use, this may impact your user experience.

7. Third party analytics

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FINPROPHET reserves the right to use third party analytics services in order to analyse the information FINPROPHET has collected from you, which may use cookies, as well as other devices and technologies to track traffic data. Information usually collected by them includes, but is not limited to, your IP address, your internet service provider, the browser you use to visit FINPROPHET website. Current document does not apply to, and FINPROPHET is not responsible for, such technologies placed and used by third party analytics services.

8. Modifications and Questions

FINPROPHET reserves the right to modify the Privacy Policy. All changes made to the Privacy Policy will be effective upon posting on the FINPROPHET website. The date of the last revision to the Privacy Policy is referred at the top of the page. You agree to be bound by any such modifications if you carry on using FINPROPHET website after such changes have been posted and e-mailed to the e-mail address you disclosed to FINPROPHET on your profile.

In case of questions about Privacy Policy do not hesitate to contact us by e-mail at info@finprophet.tech

FINPROPHET reserves the right to change, restrict access to, suspend or terminate the FINPROPHET website or providing the service.