ONE SPACE PRIVACY POLICY

One Space Privacy Policy (hereinafter — the Policy) applies to all information about Internet Users, which Simcord LLC (Company ID code 37657823) (hereinafter — the Developer) can receive during their use of the One Space mobile application.

The Policy is compiled and applied in accordance with the General Data Protection Regulation (GDPR) as well as the legislative norms and requirements existing in this field.

The aim of this Policy is to provide Internet Users with information on what type of personal data is collected, why it is collected, how it is used and processed while using the One Space mobile application.

We recommend that you read the terms and conditions of this Privacy Policy before using the One Space mobile application.

Contents:

1.   TERMS AND DEFINITIONS

1.1.   Developer means Simcord LLC, which processes the Internet Users' Personal Data.

1.2.   Personal Data means any information directly or indirectly related to a specific or designated Personal Data Subject.

1.3.   Processing of Personal Data means any action (operation) or set of actions (operations) performed using automation tools or without using such tools with Personal Data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of Personal Data and other actions.

1.4.   Confidentiality of Personal Data means a mandatory requirement for the Developer to prevent transfer (dissemination, provision) of Personal Data without the consent of the Personal Data Subject or without any other legal basis.

1.5.   Internet User means any natural person who uses the official information resources of the **Bit**bon System (hereinafter — the resources of the **Bit**bon System), but, at the same time, may not be its User.

1.6.   Personal Data Subject means any natural person or legal entity whose Personal Data is subject to processing.

2.   GENERAL PROVISIONS

2.1.   This Privacy Policy applies to the One Space mobile application and all of its Internet Users.

2.2.   If the Internet User does not agree to the terms and conditions of the Privacy Policy, he/she must immediately cease any use of the One Space mobile application.

2.3.   The Privacy Policy (including any of its parts) may be amended by the Developer. The new version of the Privacy Policy comes into force on the date of its publication on the official website www.bitbon.space/en.

2.4.   The Developer has no control over and is not responsible for the privacy practices of third-party websites. If the Internet User accepts a privacy policy on a third-party website, it does not mean that he/she accepts this Privacy Policy and vice versa. The Developer has no control over and is not responsible for the third-party websites that can be visited by clicking the links available in the One Space mobile application.

3.   SCOPE OF THE PRIVACY POLICY

3.1.   This Privacy Policy establishes the Developer's non-disclosure obligations and ensures Confidentiality of the Personal Data of Internet Users of the One Space mobile application.

3.2.   The Developer can obtain Personal Data of Internet Users during the use of the One Space mobile application.

3.3.   The data obtained through automatic collection is considered analytical (statistical) and is not the data identifying a specific Internet User. By using further analytical (statistical) data, the Developer employs all necessary measures so that a specific Personal Data Subject cannot be identified through such data.

3.4.   The Developer can obtain the following data through automatic collection:
- IP addresses;
- information from cookies (a small piece of data sent by a web server and stored on the Internet User's computer, which is sent to the web server in an HTTP request each time the Internet User tries to open the page of the corresponding website);
- information about the browser (or another program that provides access to display ads);
- access time;
- geolocation;
- address of the page where the ad unit is located;
- referrer (address of the previous page).
- unique device identifiers (for example, IDFA or other identifiers on iOS and Android devices);
- other information about the mobile device, language of use, operating system, country the resources have been accessed from;
- information related to how the Internet User interacts with the One Space mobile application (links and URLs, number of clicks, domain names, landing pages, viewed pages and order of pages, amount of time spent on certain pages, date and

time when the **Bit**bon System resources were used, error logs and other similar data).

3.5.   The Developer is not entitled to request Personal Data, which belongs to the category of special or Confidential Personal Data that discloses racial or ethnic origin, political views, religious or philosophical convictions, membership in trade unions or other information about the Personal Data Subject of a similar nature.

4.   PURPOSES OF COLLECTING PERSONAL DATA

4.1.   The Personal Data is collected in order to:
- optimize the One Space mobile application;
- provide additional protection against automated attacks and abuses/hacks;
- improve the data collection, storage and processing methods to prevent unauthorized access to the One Space mobile application;
- measure the performance indicators of the One Space mobile application;
- save settings and session data for further use;
- analyze the use of the One Space mobile application by Internet Users;
- determine the geolocation/location to select the best offers/news;
- provide effective customer and technical support should any issues related to the use of the One Space mobile application arise;
- provide feedback, including sending notifications and requests regarding the use of the One Space mobile application, services, processing requests and applications from Internet Users;
- provide updates, special offers, information, newsletters, etc.
- monitor the activity of Internet Users in the framework of the One Space mobile application.

4.2.   All collected Personal Data is used for the specific above-mentioned purposes and only to the extent necessary for the full functioning of the One Space mobile application.

5.   METHODS FOR COLLECTING AND PROCESSING PERSONAL DATA

5.1.   By accepting this Policy, the Internet User is notified that while using the One Space mobile application, the Developer can obtain data about the applications installed on the mobile device of the Internet User and use this data to implement certain functions of the One Space mobile application.

5.2.   The Developer may send the Internet User a request for provision of Personal Data or for permission to process already available Personal Data.

5.3.   The One Space mobile application uses protection tools to ensure security of Internet Users' Personal Data. When servicing the One Space mobile application, the Developer receives information that allows detecting and automatically eliminating components that pose the potential security threat to the One Space mobile application.

5.4.   The Developer uses a number of processes/methods for protecting the One Space mobile application from unauthorized attempts to access, modify, disclose or destroy data.

5.5. The One Space mobile application uses third-party services that may collect Personal Data of Internet Users. The privacy policy of third-party service providers used by the One Space mobile application can be found by the following links below:

- Google Play;
- App Store Connect;
- Firebase Analytics.

5.6. The Developer is entitled to transfer Personal Data of Internet Users to third-party services (third parties) in order to:

- optimize the One Space mobile application;
- render services related to the maintenance of the One Space mobile application.

5.7. Personal Data of the Internet User may be transferred to the authorized state authorities and/or competent organizations only on the basis and in the manner established by international laws and the laws of the country, which the subject of the requested Personal Data is a resident of.

5.8. Personal Data is provided to third-party services in accordance with the existing confidentiality requirements for the specific above-mentioned purposes, and only to the extent necessary for the full functioning of the One Space mobile application.

6. OTHER CONDITIONS

6.1. For Internet Users, who are residents of the countries in the European Economic Area (EEA), the Developer has appointed Simcord Advanced Marketing Solutions LLP (England and Wales. Partnership No. OC389221) as a representative for sending requests related to the Processing of Personal Data.

6.2. Messages or requests are sent to the Internet User's actual place of residence, e-mail address, telephone number or using any other means of communication specified by the Internet User.

6.3. The Internet User can contact the Developer through the feedback form in a specific section on the official website www.bitbon.space/en.

7. GENERAL CONDITIONS

7.1. The Developer, at its sole discretion, shall make changes and/or amendments to this Policy.

7.2. Notwithstanding the validity of this Policy in writing, its electronic version placed on the official website www.bitbon.space/en.

7.3. This Policy is translated into English and/or other languages for convenience only. In case the interpretation of the original version of this Policy (its translation into English and/or other languages) differs from Russian, the Russian version shall prevail.

7.4. Words in the singular shall mean and include the plural and vice versa.

7.5. The right to interpret the provisions of this Privacy Policy as well as the right to change the interpretations belongs exclusively to the Developer. Any other interpretation of the Policy given by the Internet User or non-compliance with these terms, conditions and procedures shall be unacceptable.